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Wastewater Treatment Facilities for the City of Post Falls, Idaho

(U.S.) Environmental Protection Agency
Seattle, WA

Aug 81

U.S. Department of Commerce
National Technical Information Service

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United States
Environmental Protection
Agency

Region 10
1200 Sixth Ave.
Seattle, WA 98101

August 1981

Water

EPA-10-ID-Post Falls-Kootenay-WWTW

EPA

Final Environmental Impact Statement

Wastewater Treatment Facilities for the City of Post Falls, Idaho

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15. SUPPLEMENTARY NOTES

16. ABSTRACT

IN THIS FINAL ENVIRONMENTAL IMPACT STATEMENT, THE ENVIRONMENTAL PROTECTION AGENCY'S POSITION ON WASTEWATER TREATMENT FOR POST FALLS, IDAHO IS PRESENTED. JOINT TREATMENT WITH COEUR D'ALENE, IDAHO, WAS CONSIDERED, BUT HIGH INTERCEPTOR COSTS WERE PREDICTED AND THIS IDEA WAS DROPPED. CONSTRUCTION OF A CENTRAL WASTWATER TREATMENT SYSTEM FOR POST FALLS WILL REMOVE A POTENTIAL THREAT TO THE WATER QUALITY OF THE RATHDRUM PRAIRIE AQUIFIER. THE AQUIFIER HAS BEEN DESIGNATED BY THE EPA AS A SOLE SOURCE DRINKING WATER AQUIFIER. THIS IS THE ALTERNATIVE PREFERRED BY THE CITY OF POST FALLS AND APPROVED BY THE EPA.

17. KEY WORDS AND DOCUMENT ANALYSIS

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SEWAGE TREATMENT COMMUNITY DEVELOPMENT ENVIRONMENTAL IMPACT STATEMENT IDAHO	POST FALLS, IDAHO	

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U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE

SEATTLE, WASHINGTON 98101

August 14, 1981

REPLY TO ATTN OF: M/S 443

TO: All Interested Agencies, Public Groups and Citizens

Enclosed for your review and comment is the Final Environmental Impact Statement (EIS) for wastewater treatment facilities for the City of Post Falls, Idaho.

This EIS was prepared in compliance with the National Environmental Policy Act and implementing Agency regulations (40 CFR Part 6, November 6, 1979). Availability of the EIS will be announced in the Federal Register on August 14, 1981, beginning a 30-day comment period which will close on September 14, 1981. This agency will take no administrative action on this project until the close of the comment period.

We will appreciate your review of this document and any comments you may have. Please send all comments to Norma Young, M/S 443 at the above address.

Final
Environmental Impact Statement

CITY OF POST FALLS, IDAHO
WASTEWATER FACILITIES PLAN
EPA PROJECT NO. C-16-0309

Prepared by:

U. S. Environmental Protection Agency
Region 10
Seattle, WA 98101

With technical assistance from:

Jones & Stokes Associates, Inc.
2321 P Street
Sacramento, CA 95816

Responsible Official:

L. Edwin Coate
Deputy Regional Administrator

July 7, 1981
Date

PREFACE

On March 6, 1981 the U. S. Environmental Protection Agency (EPA)* released a Draft Environmental Impact Statement (EIS) on the proposed wastewater treatment facilities for Post Falls, Idaho for public review and comment. The EIS was prepared to evaluate the environmental impacts of construction of the proposed wastewater facilities. Three alternatives in addition to the no-action alternative were discussed in the Draft EIS. During preparation of the draft document a regionalization option for joint treatment with Coeur d'Alene was studied. This study was prompted by the proximity of the two cities as well as the timing of the facilities planning efforts. However, the extremely high interceptor costs that were predicted caused the regionalization concept to be dropped.

The primary goal of sewering the City of Post Falls is the elimination of on-site disposal systems over the Rathdrum Prairie aquifer. This aquifer has been designated by EPA as a "sole source" drinking water aquifer. The major source of protection for the aquifer comes from the wastewater treatment policies of the Idaho Panhandle Health District (PHD). Construction of a central wastewater treatment system for Post Falls will remove a potential threat to the water quality of the aquifer and comply with PHD protection policies.

The alternative preferred by the City of Post Falls is the design and construction of a 1.5 million gallon per day (MGD) treatment plant at Site T-5 (Alternative B). EPA agrees with the selection of this alternative. Analysis shows that it is the most cost-effective and environmentally sound of the alternatives that were evaluated. As described in the facilities plan, implementation would be completed in several phases. Phase 1 of the project was shown to include a 1.0 MGD capacity extended aeration treatment plant on the west side of Post Falls and a collection system servin most of the existing city area. Seasonal phosphorus removal and dechlorination are included in the plan, with discharge of effluent to the Spokane River downstream from Corbin Park

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*A list of acronyms and abbreviations is included at the back of this report.

Funding limitations have caused Phase 1 of the project to be scaled down to a smaller collection and treatment system, with an interim outfall for discharge of effluent upstream of Corbin Park. When funds become available, the city would relocate the outfall downstream of Corbin Park. Seasonal phosphorus removal and dechlorination will not be implemented at this time. Sludge disposal will be by injection into agricultural land near Post Falls. At a later date, under Phase 2, the collection system would be expanded and the treatment plant would be enlarged to 1.5 MGD capacity. Seasonal phosphorus removal and dechlorination would be necessary at that time.

EPA recommends that funding be provided for construction of Alternative B, which has evolved as the cost-effective alternative. The project will be constructed in phases because of insufficient local, state, and federal funds to allow for full construction. A factor supporting Alternative B as the cost-effective alternative is that it will allow less costly phasing than the other two alternatives evaluated.

On April 6, 1981 EPA held a public hearing on the Draft EIS. The record of this public hearing is presented in Chapter 2. Comments received on the Draft EIS during the 45-day comment period indicate that there is concern by a number of residents of the McGuire area that the location of the proposed outfall would be a health hazard for the River Ranchettes Community and the McGuire Recreational Area. This concern was also voiced at the facilities plan public hearing on May 27, 1981. At that time it was pointed out that the outfall is temporary, and it is expected that revenue provided from new hookups to the system will provide enough money to extend the outfall downstream or allow the city to switch over to land application. The State Health and Welfare Department (IDHW) has indicated that effluent limitations for the proposed discharge are sufficient to protect the river for domestic use. In addition, IDHW has requested a more stringent total coliform limitation (23MPN/ml) for the discharge. The City of Post Falls must request a National Pollution Discharge Elimination System (NPDES) permit from EPA. Prior to issuance of the permit, EPA will hold a public hearing to provide an opportunity for comment on the permit that is proposed. Public comments will receive further consideration before a decision is made on the permit.

Although EPA concurs with the city's selection of Alternative B as the environmentally acceptable and cost-effective solution to the city's wastewater treatment needs, it is considering the following grant conditions:

- Sizing of all area interceptors must be limited to the 20-year design population and distribution densities as presented in the facility plan and associated documents. Any significant deviation from this restriction must be adequately justified, based on consideration of cost-effectiveness and environmental impacts of such sizing deviations.

- Detailed design criteria for the proposed treatment facilities as well as the criteria for sizing all interceptors and collectors will be presented to the IDHW, Division of Environment, for their approval no later than the 10 percent design completion point of the project. Final sizing and design criteria will be determined at that time.

A decision on award of a Clean Water Act Section 201 construction grant to the City of Post Falls for design and construction of the selected alternative will not be made by the EPA Regional Administrator until the close of the 30-day comment period on this Final EIS.

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EXECUTIVE SUMMARY

( ) Draft Environmental Impact Statement

(X) Final Environmental Impact Statement

Type of Action: Administrative

Project Need

The City of Post Falls, Idaho is the largest city in Idaho without centralized wastewater collection treatment and disposal facilities. Each home or business relies on a septic tank or other type of individual on-site system for wastewater treatment and disposal.

It has been determined that these on-site waste disposal systems are contributing pollutants to the Rathdrum Prairie Aquifer. The aquifer is of high quality and serves as a major drinking water source for over 340,000 people in the Spokane River basin. Because of its value as a drinking water source, EPA designated the aquifer a "sole source aquifer" under the federal Safe Drinking Water Act in 1978. The Idaho Panhandle Health District (PHD) has the responsibility for protection of the aquifer. Construction of a central wastewater treatment system would comply with the aquifer protection policies of the PHD and would allow additional residential and commercial development in the area.

Project Funding

The City of Post Falls applied to the U. S. Environmental Protection Agency (EPA) for funds to develop a facilities plan for the design and construction of a central wastewater collection, treatment, and disposal system to serve city residents and adjacent urbanizing unincorporated areas. Treatment facilities and interceptors are typically eligible for a 75 percent federal grant and 15 percent state grant. The city passed a bond issue in November 1979 to finance the local share of the project. The amount of bonds that will be offered for sale will be based upon final project costs.

Pursuant to Section 201 of the Clean Water Act, EPA has awarded Step I planning funds. Before additional funds for design and construction of a selected project can be awarded to the city, EPA must complete an environmental review of

potential impacts of the project. This review must meet the requirements of the National Environmental Policy Act (NEPA). In addition, the Safe Drinking Water Act requires that federal agencies ensure that any action taken does not lead directly or indirectly to contamination that would create a significant health hazard in a "sole source aquifer". To comply with these requirements, EPA has prepared a Draft and this Final Environmental Impact Statement (EIS) to evaluate the consequences of the construction of the proposed wastewater treatment facility.

The State of Idaho priority list for financial assistance includes $315,000 in fiscal year 1981 for Post Falls facilities design (Step II). The city has applied for an additional $4,033,000 for facilities construction (Step III) in fiscal year 1982. The priority list and funding availability have not yet been determined for 1982. Post Falls will become eligible for the $315,000 grant once this EIS is completed and the facilities plan has received final approval.

Project Alternative Selected by the City of Post Falls

The city has selected Alternative B with treatment facilities at Site T-5, as the preferred wastewater management plan. A general description of the treatment plant design and location, effluent discharge site, selection criteria and rationale, and the environmental impacts follow.

Treatment Plant Design

Liquid waste arriving at the treatment plant will undergo mechanical biological treatment (extended aeration). This process requires construction of a concrete aeration basin with 24-hour detention time. The raw sewage receives comminution and grit removal prior to discharge to the aeration basin. The organic material in the sewage is oxidized aerobically by a suspended culture of micro-organisms called activated sludge. Oxygen necessary for bacterial respiration is supplied by compressed air discharged at the bottom of the aeration tank through diffusers. The activated sludge is separated from the suspension in a clarifier and recycled back to the aeration basin to remove the waste material again. The overflow from the clarifier will be chlorinated prior to discharge to the river to reduce bacteria, virus, and parasite concentrations to acceptable levels.

Due to the reduced biological activity in the cool winter months, waste sludge from the treatment plant will require additional treatment in aerobic digesters. A concrete tank will be utilized which can be readily expanded for future

upgrading and also designed to allow conversion to an anaerobic digester at a future date. The tanks will be covered and insulated to reduce temperature loss in the winter months. Decanting facilities will be provided to remove the supernatant and to thicken the sludge. Supernatant will be returned to the headworks for treatment.

Digested sludge will be stored during the winter in earthen lagoons. During the dry periods of spring, summer, and fall the sludge will be trucked to agricultural land and injected subsurface as a soil conditioner and fertilizer. At the present time, a specific disposal site has not been identified.

Advanced Wastewater Treatment

Advanced treatment technology is designed to remove pollutants which are not adequately removed by secondary treatment processes.

Phosphorus Removal. Phase 1 (1.0 MGD capacity) of the project preferred by the city will not provide for removal of influent phosphorus during any period of the year. However, when Phase 2 (1.5 MGD) is implemented, seasonal phosphorus removal of 85 percent would be required. The proposed method of phosphorus removal is by alum addition to the aeration basins.

Dechlorination. Dechlorination will not be implemented under the "initial project". A monitoring program, including bioassays, should be established which samples water quality downstream from the waste treatment facilities. If it is determined that acceptable levels of chlorine are being exceeded, dechlorination will be initiated. The method of dechlorination will be with sulfur dioxide.

Project Phasing

The 20-year design flow capacity of the proposed Post Falls wastewater treatment facilities is 1.5 MGD. The Draft Facilities Plan proposes design and construction of the facilities in several phases. Phase 1 would provide for a collection system, a 1.0 MGD treatment plant, and a disposal mode to accommodate the design flow. Effluent would be discharged to the river year-round at a point downstream from Corbin Park.

Phase 1 of the project has been scaled down, however, from the capacity proposed in the Draft Facilities Plan because funds will not be available in the amounts originally anticipated. The "initial project" to be implemented differs from the Phase 1 project in that the proposed collection system will be reduced in size and an interim effluent discharge site will be located upstream from Corbin Park. When funds become available, the outfall site will be relocated downstream from the park.

Phase 2 of the project will provide for expansion of the treatment facility to accommodate a maximum flow of 1.5 MGD and extension of the collection system. The state has indicated that a design flow of 1.5 MGD corresponds with approved population projections and should provide satisfactory capacity for the 20-year planning period.

Treatment Facility Site

The treatment plant will be located on the site designated T-5 in the facilities plan. This site is just west of the city limits, bounded by Interstate 90 to the south and State Highway 10 to the north. The county zoning designation for the portion of the property outside the city limits is agricultural suburban and commercial; the portion of the property within the city limits is designated industrial. The site is currently being used to grow grass crops.

Outfall Site

During the "initial project" phase of Phase 1, an interceptor will be constructed from the T-5 site directly south to the Spokane River. This outfall site is downstream from the Post Falls Dam but, 1.3 miles upstream from Corbin Park and the Riverside residential development.

The outfall site will be relocated when funds become available to a site near the end of Spokane Road, downstream from Corbin Park.

Collection System

Due to the nature of the terrain in and around Post Falls, a conventional gravity sewer system will be constructed. The original Phase 1 service area included the central portion of Post Falls, bounded by the river to the south, Pole Line Road to the north, Nelson Street to the west, and Idaho Street to the east. In addition, it extended eastward between the

river and Interstate 90 as far as Pinevilla Estates. During the "initial project" phase of Phase 1 the collection system is now expected to serve only the central portion of Post Falls as described above. The service area will be expanded when Phase 2 of the project is implemented. Boundary designations are illustrated in the Draft EIS (EPA 1981, Figure 2).

Project Selection Criteria and Rationale

The alternatives comparison in the facilities plan (LePard and Frame, Inc. 1980) was based on the evaluation of several general criteria. These included cost, flexibility, resource requirements, reliability, public health, residual waste, and implementation capability. Based on these criteria Alternative B, located at Site T-5, was chosen as the most desirable waste management plan.

A primary factor in selection of this alternative was the lower capital expenditure. Alternative C is within the 15 percent envelope which is allowed for land application projects. However, acquisition of a noncontroversial lagoon site could increase Alternative C costs beyond the 15 percent allowed. Cost-effective analyses also indicate that Alternative B would be the least expensive alternative to implement in phases. A breakdown of costs for each proposed alternative is tabulated in the section entitled Environmental Impacts.

The project site for Alternative B is immediately available for construction, whereas the land application site designated in Alternatives A and C may not be available on terms acceptable to the city and/or regulatory agencies. The final draft facilities plan also indicates that, on an annual basis, Alternative B would require less energy to operate (LePard and Frame, Inc. 1980).

From a health perspective, Alternative B, unlike Alternatives A and C, would not require land irrigation disposal. Irrigation disposal could increase groundwater levels of nitrates and other toxic pollutants. The health risk on lands adjacent to the irrigation area due to wastewater aerosol drift is also eliminated. A more complete discussion of environmental impacts is contained in the following sections.

Environmental Impacts of Alternative B

Impacts to the Spokane River

Effluent discharged to the Spokane River would result in small increases in nutrients, toxins, and heavy metals. The nutrient increases would probably enhance algal production during the summer months immediately downstream from the outfall site as well as in downstream impounded areas. The toxins and heavy metals could potentially reduce fish productivity, especially in the less mobile early life history stages of fish.

A conceivable health risk to water-contact recreationists exists downstream from the effluent discharge site. The "initial project" phase of Phase 1 provides for the outfall site to be located upstream from Corbin Park, a popular recreational site. Adequate disinfection of the wastewater prior to discharge should alleviate any potential problems.

Persons drawing domestic water supplies from the Spokane River downstream from the outfall also face a potential health risk. There are an estimated 12 residences drawing drinking water from the river immediately downstream from the proposed interim outfall site. If alternate water supplies cannot be located for these people, disinfection of wastewater should be monitored closely.

The possibility of treatment plant malfunction is always present. Serious health problems as well as injury to the fishery could result from a discharge of untreated sewage into the river. Treatment plant storage capacity will be provided within the system for this contingency.

Impacts to the Rathdrum Prairie Aquifer

Increases in groundwater nitrate as well as other pollutant concentrations are possible due to interchange with the Spokane River below the outfall. A monitoring program designed to assess pollutant concentrations in the effluent on a regular basis would aid in identifying and subsequently reducing adverse impacts.

Treatment processes will generate in excess of 600,000 pounds (dry weight) of sludge annually. Although a specific disposal site has not been selected, it will presumably be over the aquifer. Even if the sludge is applied uniformly to the land and the necessary acreage is available, the potential for groundwater pollution exists. Thus, shallow

groundwater should be monitored in the vicinity of the disposal area to assess long-term groundwater degradation. If industrial or commercial flow becomes a significant part of the total Post Falls wastewater flow, pollutant concentrations in the sludge should be periodically tested.

Land Use Conflicts

The principal impacts to residents in proximity to the treatment facility include odor and noise generation as well as the visual appearance of the facility itself. Odors can be reduced by ensuring that all treatment plant structures are properly maintained, including all odor control equipment. A monitoring program should be established so that off-site impacts can be rapidly detected and corrective action can be undertaken.

Noise can be reduced by restricting truck traffic to the hours between 9:00 a.m. and 5:00 p.m. Another mitigation measure would be to construct a berm or vegetative screen around the treatment facility. This would also reduce the visual impact to motorists on the nearby highways.

Major Growth Implications

Much of the prime agricultural land in the facility planning area is under cultivation, with grass seed and alfalfa comprising the major crops. It appears that growth accommodated by wastewater facilities could facilitate the conversion of some prime agricultural lands to urban uses. Potential mitigations include the enactment of stronger local restrictions on agricultural land development and preferential property tax assessment to encourage continued agricultural production.

Based on projected new acreage required to accommodate future populations in the Post Falls area, urban runoff could increase to levels which threaten further degradation of the Rathdrum Prairie Aquifer. Local ordinances and ongoing 208 water quality management planning are necessary to ensure control of these nonpoint pollution sources.

Costs

The original present worth cost comparison of the three major project alternatives is illustrated in Table 1. The total cost is based on the sum of capital required for facilities construction, 20 years of operation and maintenance costs, minus the present worth salvage value. Alternative B is the most cost-effective alternative.

Table 1. Total Present Worth Cost Comparison of Alternatives

Alternative	Capital	Salvage Value	Operation and Maintenance	Total
A	$9,732,000	-$1,248,000	$2,133,000	$10,617,000
B	6,975,000	-830,000	2,529,000	8,674,000
C	9,524,000	-1,487,000	1,786,000	9,823,000

SOURCE: LePard and Frame, Inc. 1980, Table V-18.

The total cost of the full Phase 1 project would be $14,666,870. The local community would be required to contribute $2,998,794 of this amount (Table 2). The cost for the "initial project" phase of Phase 1 now being considered would be $5,747,000 with the local share amounting to $1,085,200 (Table 2). Projected monthly user fees are illustrated in Table 3.

EPA's Recommended Action

EPA concurs with the City of Post Falls that Alternative B is the preferred wastewater management plan. It is the environmentally preferable alternative and is also the most cost-effective alternative. Before grant funds can be distributed for implementation of Steps II and III, however, EPA is considering several conditions which would require compliance by the City of Post Falls.

- Sizing of all area interceptors must be limited to the 20-year design population and distribution densities as presented in the facility plan and associated documents. Any significant deviation from this restriction must be adequately justified, based on consideration of cost-effectiveness and environmental impacts of such sizing deviations.

- Detailed design criteria for the proposed treatment facilities as well as the criteria for sizing all interceptors and collectors will be presented to the IDHW, Division of Environment, for their approval no later than the 10 percent design completion point of the project. Final sizing and design criteria will be determined at that time.

In addition, EPA recommends that the following measures to mitigate potential impacts of the project be investigated:

- As soon as additional funding becomes available the outfall should be relocated to its originally intended location downstream from Corbin Park.

- A program should be initiated to monitor river concentrations of residual chlorine, un-ionized ammonia, fecal coliform bacteria, and phosphorus. Sampling stations should be located immediately downstream as well as upstream from the effluent discharge site.

- An investigation should be conducted to determine if an alternate water supply exists for those persons using the Spokane River downstream from Post Falls Dam as a source of drinking water.

Table 2. Phase 1 and Initial Project Costs - Alternative B

	Phase 1		Initial Project[3]	
	Total	Local Share	Total	Local Share
Treatment facility, interceptors, outfall	$ 5,017,000[1]	$ 691,700[1]	$4,313,000	$ 462,800
Collection system	9,649,870[2]	2,307,094[4]	1,434,000	622,400
TOTAL	$14,666,870	$2,998,794	$5,747,000	$1,085,200

[1]LePard and Frame, Inc. 1980, Table VII-1.
[2]LePard and Frame, Inc. 1980, Table V
[3]LePard and Frame, Inc. pers. comm.
[4]Calculated from data presented in LePard and Frame, Inc. 1980, Table V.

Table 3. Monthly User Fees - Alternative B[1]

	Phase 1[2]	Initial Project[3]
Bond repayment	$1.65	$ 6.20
Operation & maintenance	7.00	7.80
TOTAL	$8.65	$14.00

[1]LePard and Frame, Inc. pers. comm.

[2]Does not include cost of funding collection system construction.

[3]Includes collection system funding; also includes cost of phosphorus removal operation and maintenance.

- o Urban runoff control measures should be developed and implemented through the 208 program.

- o Groundwater should be monitored in the vicinity of the sludge disposal site.

- o If industrial or commercial flows become a significant percentage of the total wastewater flow, the sludge should be periodically tested for the presence of hazardous wastes.

- o A pretreatment ordinance, as required by the Clean Water Act, should be developed if industrial and commercial wastes are intercepted by the cities' collection system.

- o Strict odor control measures should be implemented in the treatment plant design and operation.

- o A berm or vegetative screen should be constructed around the treatment facility.

- o Prime agricultural land in the proposed service area should be protected to the extent possible.

Coordination

Since initiation of this EIS in June 1979, there has been an EIS scoping meeting (June 4, 1979 in Coeur d'Alene, Idaho) and frequent EPA contact with local and state agencies and private citizens. These efforts have sought to identify environmental issues related to the wastewater facilities plan and to collect background environmental data for use in preparation of the EIS.

The Draft EIS was distributed for public review on March 6, 1981. A public hearing was held on the draft document on April 6, 1981 in Post Falls, and the official comment period extended to April 20, 1981. All written and oral comments received on the Draft EIS have been responded to in this Final EIS. Persons wishing to comment on the Final EIS should submit their material to Ms. Norma Young, M/S 443, U. S. Environmental Protection Agency, Region 10, 1200 Sixth Avenue, Seattle, Washington, 98101 no later than September 14, 1981. All comments received prior to that date will be considered by EPA before action is taken on Clean Water Section 201 requests from the City of Post Falls. After close of the comment period, the EPA Regional Administrator will make a final decision on funding of the proposed project in a Record of Decision. A list of persons receiving the Draft EIS is included at the back of this Final EIS.

Chapter 1

LETTERS OF COMMENT ON THE DRAFT EIS AND EPA RESPONSES

Introduction

The Post Falls Draft EIS was available for public review from March 6, 1981 to April 20, 1981. During this period EPA, Region 10 received 10 letters of comment on the document (see listing below).

The letters are presented on the following pages. Each comment that has been marked and numbered in the left hand margin has received a response, which can be found immediately following the comment letter.

List of Individuals and Agencies Submitting Written Comments on the Draft EIS

Federal Agencies

Advisory Council on Historic Preservation
U. S. Dept. of Agriculture, Soil Conservation Service, Boise Office
U. S. Dept. of Army, Corps of Engineers, Seattle District
U. S. Dept. of Housing and Urban Development, Seattle Regional Office
U. S. Dept. of Interior, Office of the Secretary, Pacific Northwest Region

State Agencies

Idaho Dept. of Fish and Game, Region 1
Idaho Dept. of Health and Welfare, Division of Environment
Idaho Division of Economic and Community Affairs

Local Agencies and Individuals

East Greenacres Irrigation District
River Ranchettes Community - I. D. McChesney

Advisory Council On Historic Preservation

1522 K Street, NW
Washington, DC 20005

Reply to:

Lake Plaza South, Suite 616
44 Union Boulevard
Lakewood, CO 80228

April 22, 1981

Mr. Donald P. Dubois
Regional Administrator
U.S. Environmental Protection Agency
Region 10 - 1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Dubois:

The Council has reviewed your draft environmental impact statement (DES) for the City of Port Falls, Idaho wastewater facilities plan, circulated for comment pursuant to Section 102(2)(c) of the National Environmental Policy Act. Your DES appears adequate concerning our area of interest. Our only comment concerns archeological site 10-KA-44, located by the University of Idaho, Laboratory of Public Archeology. If it proves impossible to avoid either direct or indirect impacts to this site, then EPA must seek a determination of the site's eligibility for inclusion with the National Register of Historic Places, in accordance with 36 CFR Part 1204 and then comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. Sec. 470f, as amended, 90 Stat. 1320) and the Council's regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800), as appropriate. 1

If you have any questions or require assistance, please contact Marjorie Ingle of my staff at (303) 234-4946, an FTS number.

Sincerely,

Louis S. Wall
Chief, Western Division
of Project Review

RECEIVED
APR 28 1981
ENVIRONMENTAL EVALUATION BRANCH

Response to Comments From Advisory Council on Historic Preservation

1. EPA does not anticipate direct or indirect impacts to site 10-KA-44. The City of Post Falls must ensure, during the project's design phase, that interceptor construction will not encroach on site 10-KA-44. If impacts cannot be avoided, the steps mentioned will be completed by EPA.

United States Department of Agriculture

Soil Conservation Service

Room 345
304 North 8th Street
Boise, Idaho 83702

April 1, 1981

RECEIVED
APR 3 1981
ENVIRONMENTAL EVALUATION BRANCH

Ms. Norma Young
Environmental Protection Agency
Region X, 1200 Sixth Avenue
Seattle, Washington 98101

Dear Ms. Young:

The following comments are made in regards to the DEIS, Wastewater Treatment Facilities - Post Falls, Idaho:

1. Soil is suitable to all alternatives.

2. The flat and gentle slopes will give only minor problems of erosion and run-off. The soil is medium textured, therefore, minor wind and water erosion is anticipated during construction.

3. Disturbed areas are to be seeded to grass so this will provide soil erosion protection of the sites.

4. No anticipated flooding problems.

5. There is no planned work that will disrupt the natural drainage patterns.

6. Treatment plant site will be revegetated.

7. There will be a small impact of agricultural production on prime agricultural land.

   Land Disposal Site

   a) Production will be changed only from rotation of crops to a crop for forage.

   b) Only involves a small amount of agricultural land.

   Tre.tment Plant Site

   a) Only a few acres involved.

   b) Location is near city so there is less chance of it staying in agricultural production anyhow.

8. The land use change will have little effect on the plant community, wildlife, and aesthetic values. Wildlife could be improved by the change.

9. There is no major SCS project affected by the proposals. Assistance to the individual land owners would be only slightly affected.

Sincerely,

James N. Halsey Acting

Amos I. Garrison, Jr.
State Conservationist

DEPARTMENT OF THE ARMY
SEATTLE DISTRICT, CORPS OF ENGINEERS
P.O. BOX C-3755
SEATTLE, WASHINGTON 98124

NPSEN-PL-ER

17 APR 1981

Ms. Norma Young
U.S. Environmental Protection Agency
Region X
1200 Sixth Avenue, M/S 443
Seattle, Washington 98101

Dear Ms. Young:

We have reviewed the draft environmental impact statement for wastewater treatment facilities for the city of Post Falls, Idaho, with respect to the U.S. Army Corps of Engineers' areas of responsibility for flood control, navigation, and regulatory functions.

We suggest including a section titled "Laws, Rules, and Policies Affecting the Proposed Wastewater Treatment Plan," and incorporating the following statement: A Department of the Army permit may be required for the discharge of fill(s) in and/or on wetlands adjacent to waters of the United States in the proposed project area, pursuant to Section 404 of the Clean Water Act.

Thank you for the opportunity to review this statement. If you have any questions, please contact Dr. Steven F. Dice, telephone (206) 764-3624, of my staff.

Sincerely,

Sidney Knutson

SIDNEY KNUTSON, P.E.
Asst. Chief, Engineering Division

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Response to Comments From U. S. Department of Army, Corps of Engineers

1. Laws and regulations are discussed in the text of the impact sections of the Draft EIS, where appropriate. Your comment has been incorporated into this Final EIS. The City of Post Falls should contact the Corps of Engineers, Seattle District, prior to excavation or filling in or adjacent to the Spokane River to determine if a Section 404 permit is required.

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
REGIONAL OFFICE
ARCADE PLAZA BUILDING, 1321 SECOND AVENUE
SEATTLE, WASHINGTON 98101

May 13, 1981

REGION X

IN REPLY REFER TO:
10C

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MAY 18 1981
ENVIRONMENTAL EVALUATION BRANCH

Ms. Norma Young
Environmental Protection
Agency, M/S 443
1200 Sixth Avenue
Seattle, Washington 98101

Dear Ms. Young:

Subject: Environmental Impact Statement - Post Falls, Idaho

I am sending you comments that we have received from our Portland Area Office.

Although the review period has expired, I would appreciate your consideration of these comments.

Sincerely,

Gordon N. Johnston
Regional Administrator

Attachment

cc: Nile Paull, HUD Portland
Cliff Safranski, HUD Portland

Memorandum

U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT

TO : Robert C. Scalia, Regional Director, CPD, SRO DATE: 05/08/81
Attention: Ry Tanino

FROM : Clifford T. Safranski, Environmental Division, PAO, 10.2S

SUBJECT: DEIS - Wastewater Treatment Facilities for Post Falls, Idaho

Priority was given to CDBG application reviews but these comments may still be of value.

The City of Post Falls has grown from less than 2,400 people in 1970 to 5,650 in 1980 without the benefit of an urban sewer system. Various population projections an d consequent treatment plant capacities needed vary from 1.0 MGD to 2.4 MGD. This treatment plant range provides for a capacity variance of almost 2 1/2 times. This has obvious implications on the population supportable.

Since the sanitary sewer system is a growth inducing factor its capacity and placement will exert development pressures in a given pattern.

Page 9 states, "Funding will be available only for the population level acceptable to the State, which is a 20-year design project of 16,000 persons or approximately 1.5 MGD capacity."

It was stated that the EIS was not revised to refleect acceptable population levels, so essentially the 2.4 MGD capacity provided the basic data.

Page 10 states, "Mitigations are not necessarily those that will be implemented should a project be constructed." This statement negates much of the value in reviewing them.

Page 23 states, "Wastewater flow projections developed by the facilities planners indicate that this 1.0MGD limit could be reached by 1982." The project is almost too late.

Page 26 for treatment plant sites criteria states "5. Displacement of existing residences should be minimized and the site should not be near areas which are presently developed or are areas of future growth." Site T-1 was rejected by neighboring residents.

1 Page 37 evaluated a regional facility based on 2.4 MGD for Post Falls and 6.0 MGD for Coeur d'Alene. The Coeur d'Alene plant would be 11 miles away, a Liberty Lake plant would be 5.5 miles west. Both these alternatives were dropped because they would cost more than alternatives A, B or C. Were a combined plant construction cost and 20 year operating costs weighed against 2 or 3 separate plants?

2 Page 37 states, "It now appears state grant money and loans needed to finance both the collection system and the treatment plant are not going to be available in the amount originally estimated." Is this the primary factor in reducing the scale from 2.4 MGD and a design population of 26,840?

PREVIOUS EDITION IS OBSOLETE

HUD-96 (7-75)

3 Page 38 states, "The state has recommended planning for a 20-year waste flow of 1.5 MGD. As a result, LePard and Frame has made some revisions...reflected in the final draft facilties plan. The current recommended plan is to construct a 1.0 MGD treatment plant at site T-5." "The 1.0 MGD plant size is intended to avoid the immediate need for phospherous removal facilties." "The second phase of treatment plant construction is not clear at this time." "This project phasing is being considered as a means to implement alternative A in this Draft EIS."

4 Page 41 states, "Construction at Site T-5 would remove prime farmland..." "There are not residential or commercial land uses in the vicinity of Site T-6. In addition, the soils on this site do not qualify as prime farmland according to the U.S. Soil Conservation Service." Does site T-6 have some unstated problems?

Page 41 lists the preferred site for spray disposal as Site S-1 and states it is not prime farmland. In addition, the other sites proposed were ajacent to developing residential uses or were in the 100 year flood plain.

5 Pages 46, 47, and 48 Tables could be improved by adding a column with recognized National or alternative acceptable standards. The section on Pages 44 to 60 appear too technical for public review of the DEIS. A more succinct and simplified version would help the public understand and technical papers could be in the appendix.

6 Page 67 states, "Background fecal coliform levels as recorded at USGS gaging station 1214900 just below Post Falls Dam range from less than 1MPN/100 ml to over 800MPN/100 ml. This ranges well above the 200MPN/100 ml fecal coliform limit. In addition, "The National Iterim Primary Drinking Water Standards limit fecal coliform levels in domestic water supplies to 4MPN/100 ml."

It appears that untreated domestic water supplies should not be drawn from the river even in the absence of a catastrophic event or treatment plant malfunction.

Pages 81-84

7 The DEIS effectively makes a case for discharging treated effluent into the Spokane River and using the aquifer for the drinking water source. A lined holding pond as a back-up to allow time for clean-up of the river in case of malfunction and a water storage tank for emergency water supply seem to be necessary precautions.

Page 88

8 Land disposal Site S-1 appears to be the only site acceptable of the 3 alternatives studied. However, some questions seem to be unresolved about the eventual impact on the aquifer, the destruction of the soil and the impermeability buildup of the soil which would lead to run off, etc. In addition, Site S-1 is near a trailer court.

Pages 89-97

8 In terms of land use, only Site T-6 appears to not conflict with zoning or other development potential.

9 None of the land application sites seem appropriate since they are all near residential uses which may require relocation.

Page 101

10 Table 2-15 seems to assume the land disposal sites will be operable for the twenty year period without replacement and without "in lieu of taxes" expenses.

Page 105

11 The local collection system is estimated to cost $6,162,870. Is there a timetable and funding plan developed? What are the user fees estimated to be for the collection system? Total monthly user fees would provide more information on impacts. If grants are not available and/or the bonding markets not receptive the costs would significantly increase.

Page 113

12 It seems incongruous that the growth is predicated on and even directed in a contiguous corridor connecting Post Falls, Coeur d'Alene and Hayden without a more intensive study of a regional facility in the corridor.

13 Page 118 seems to reflect local inconsistency. "...county policies support the protection of agricultural lands in current production." However, "...since most of this area is designated as transition in the Kootenani County land use plan, additional residential development is likely." "It appears therefore that continued agricultural use in this area has been precluded by development and that growth accomodated by wastewater facilities will facilitate the conversion of prime agricultural lands to urban uses."

It is understandable that zoning would need to be changed to accomodate an unplanned for treatment plant. It is more difficult to understand following a plan that seems to be internally inconsistent with its own policy.

Page 121

14 It is difficult to accept that no air quality problems exist when primary standards have been exceeded 5 of 10 years and secondary standards have been exceeded the other 5 years. The population increase projected from less than 2,400 in 1970 up to 26,000 in the year 2,000 (over 1000% increase) for the

14 service area may warrant a closer look. Even the 1.5 MGD capacity is almost a 300 % increase in the 1980 population. However, if this is consistent with the S.I.P. it does seem acceptable.

However, page 125 suggests a 16,100 person increase so the serviced population would be about 21,000.

Pages 120-125

The significant increase in urban storm water runoff generated by the increased development appears to place responsibility for mitigation measures on the locality. More intensive development at higher densities reduces the opportunity for open space to absorb. That means either storm sewers or street drainageways can be expected to contribute to degradation of water quality. Oil skimmers and settling basins could provide substantial mitigation if properly designed and constructed.

Page 125

15 The increases in electrical and gas consumption are predicated on a 3 person household while census data reflects a 2.5 person household so estimates may be about 20% low.

It would be interesting to see figures based on the 5 acre residences, a moratorium and the urban density facilitated by the wastewater treatment plant to compare effects.

Incidentially, the 2.5 figure would produce 6,400 DU's as opposed to the 5,367 DU's derived from the 3.0 per household figure.

Page 127

16 It appears that water supply and distribution is a current problem. Was a cost determined or estimated for adequate service to the 16,100 added population?

17 For some reason many parts of the DEIS seemed to read more like a justification for a selection rather than an open analysis.

Many sections seemed to be oriented to support a specific alternative as in the case of making the selection of Site T-5 work or quickly discarding the need for evaluating other alternatives to S-1.

18 In other sections the highly technical writing style would seem to preclude analysis by the general public.

The need for the treatment plant is obvious and overdue and the community has been made aware that secondary impacts can be expected to be substantial. The community may also want to take responsible action to restrict or phase

development to be consistent with other needed facilities and services. Although sanitary sewer capacity would no longer be a constraint to development, the water supply or storm water systems may remain constraints until provision is scheduled for them.

Thank you for the opportunity to comment.

Environmental Clearance Officer

Response to Comments From U. S. Department of Housing and Urban Development

1. Cost comparisons were made between separate plants at Post Falls and Coeur d'Alene, or a single regional plant serving both cities. A regional plant for all three communities was not considered because of expected institutional problems caused by crossing state lines.

2. The primary reason for reducing the plant's design capacity from 2.4 to 1.5 MGD was that the facilities plan 20-year population estimate greatly exceeded the projections acceptable to EPA and the State of Idaho for wastewater facilities planning. Funding limitations have further reduced the size of Phase 1 of project construction.

3. The city's preferred alternative is B, which has conditional approval by EPA.

4. Yes. The advantages of Site T-6 are offset by the high construction and operating costs due to the relatively great distance between the treatment plant site and the city. Land availability is also in question at Site T-6.

5. We agree. The relevant water quality standards were mentioned in the text; however, an inclusion in the tables would have made analysis much easier.

A meaningful water quality analysis cannot be presented without use of some technical information. This information has been presented as clearly as possible to allow comprehension without losing usefulness to the general public and to regulatory agencies. It would not be proper to put the technical information in the appendix because this information is indispensable for proper review of the water quality section.

6. The fecal coliform standard of 200 MPN/100 ml is determined as an average. Background levels in the river do exceed this limit; however, the standard is not violated because the mean values ($\sim$20 MPN/100 ml) are well below the required limit (Table 2-1 of the Draft EIS). Background levels in the river regularly exceed the drinking water standard of 4 MPN/100 ml. EPA agrees that a fecal coliform problem exists with respect to drinking water.

7. The proposed treatment plant will contain storage capacity for use in the event of a plant malfunction. EPA agrees that an emergency or alternative water source should be found for persons drawing domestic water from the river below Post Falls Dam as a necessary precaution.

8. Land disposal is not being pursued at this time. Treatment Site T-5 has been selected by the city and the engineers because it is readily available and close to the city, thereby minimizing interceptor construction costs. The land use conflicts of Site T-5 can be minimized with proper mitigation measures (see EPA recommended action).

9. The city is not considering land application at this time; therefore, no conflict is expected.

10. This is correct.

11. A funding plan has been formulated by the city for phased development. The timetable has not been set. The user fees are estimated by Lepard and Frame to be $14 per month for the initial construction project. This includes treatment plant, outfall, interceptors and collection system. It also assumes considerable grant aid from the state and federal governments and a low interest loan from the Farmers Home Administration. If the grants or loans are not received as expected, the monthly user fees would have to be much higher.

12. A preliminary look at a regional facility for Post Falls and Coeur d'Alene was made but the monetary costs were found to be too high. EPA will continue to review the growth implications and regional treatment feasibility of the three facilities planning efforts during the Hayden and Hayden Lake facilities planning EIS process. The timing of wastewater facilities needs has been a principal hindrance to consideration of regional treatment facilities.

13. Comment noted.

14. EPA does not believe a significant air quality problem exists. Table 2-20 in the Draft EIS shows the total suspended particulate values have decreased or remained constant despite population growth during the last 10 years. Few primary standards have been violated within the last 5 years. In addition, Table 2-20 may be misleading because the number of standard violations per year would give a better indication of air quality problems than the yearly averages given.

15. If the lower persons per dwelling unit figure is used, annual electrical demand would be expected to increase by 91.69 million Kwh and annual gas demand would increase by 6.21 million therms.

16. The determination of costs for the water supply and distribution is the responsibility of the City Public Works Department. Specific costs for the 16,100 new residents were not available for this Draft EIS. A report prepared for the city in 1979, however, estimated that $2,540,000 in water supply system improvements were needed to meet the expected service demands to the year 2000 (LePard and Frame, Inc. 1979). This was expected to service a population of 14,000.

17. EPA has conducted an open analysis of all alternatives. Sites T-5 and S-1 are both relatively attractive sites based on the information available. We do not believe that our analysis directs that any alternative should be chosen without a fair evaluation of all alternatives.

18. Comment noted.

United States Department of the Interior

OFFICE OF THE SECRETARY

PACIFIC NORTHWEST REGION

500 N.E. Multnomah Street, Suite 1692, Portland, Oregon 97232

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APR 17 1981

OFFICE OF
REGIONAL ADMINISTRATOR

April 16, 1981

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APR 22 1981

WATER DIVISION

ER 81/263

Donald P. Dubois
Regional Administrator, Region X
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Dubois:

The Department of the Interior has reviewed the draft environmental statement for Wastewater Treatment Facilities for the City of Post Falls, Kootenai County, Idaho and offer the following comments.

Cultural Resources

Archeological and Historical Resources are discussed on page 125 of the DEIS. Research conducted by the University of Idaho Laboratory of Anthropology indicates that it is unlikely that continued growth in the Post Falls area will adversely affect known or undiscovered cultural resources.

The National Register of Historic Places was reviewed and no designated or nominated sites were found in the Post Falls area. The archeological report prepared by the University of Idaho Department of Anthropology is included in Appendix A of the DEIS. A copy of the report was sent to the Idaho State Historic Preservation Officer (SHPO) and the SHPO concurred with the University of Idaho's finding.

1 However, despite its unlikelihood, the possibility does exist that unanticipated cultural remains could be discovered during construction. If this occurs, work in the immediate area should be discontinued and the SHPO should be notified.

Recreation

The impact of the proposed project on recreational uses of the Spokane River is discussed on pages 60-64. From the information in the DEIS, it appears there will be no significant impact on white water sports, scuba
2 diving, boating, fishing, hunting, camping and picnicking. However, a popular swimming location, accessible via Pleasantview Road does exist downstream from the proposed outfall site. The alternative B wastewater

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2 discharge would increase the potential health hazard along this stretch of the river (page 62). Mitigation measures to compensate for the loss of this swimming area should be outlined in the final Draft Environmental Impact Statement if alternative B is selected.

3 The potential for additional recreation and open space opportunities at the project site should also be analyzed. Section 13, entitled "Recreation and Open Space" of the Clean Water Act of 1977 amends Section 201(g) of the Federal Water Pollution Control Act by adding the following amendment:

Recreation and Open Space

Sec. 13. Section 101(g) of the Federal Water Pollution Control Act is amended by adding at the end thereof the following new paragraph:

"(6) The Administrator shall not make grants from funds authorized for any fiscal year beginning after September 30, 1978, to any State, municipality, or intermunicipal or interstate agency for the erection, building, acquisition, alteration, remodeling, improvement, or extension of treatment works unless the grant applicant has satisfactorily demonstrated to the Administrator that the applicant has analyzed the potential recreation and open space opportunities in the planning of the proposed treatment works."

Discussion of new recreation opportunities or a statement explaining the lack of such opportunities would satisfy the requirements of the Clean Water Act of 1977.

4 Because results of monitoring ground-water quality indicate that septic tanks are contributing to degradation (page 75), we suggest that the proposed plan should consider measures for the proper abandonment of septic-tank facilities following installation of the wastewater treatment system. Such action would minimize any long-term effects on ground- and surface-water quality that may result from improperly abandoned septic systems.

We appreciate the opportunity to review and comment on this statement.

Sincerely,

Charles S. Polityka

Charles S. Polityka
Regional Environmental Officer

Response to Comments From U. S. Department of the Interior

1. EPA agrees that the SHPO must be contacted if cultural materials are unearthed during construction.

2. EPA believes there should be no significant increase in the potential health hazard along this stretch of river. In order to ensure that health hazards are not created, however, strict disinfection standards are being placed on the waste discharge. Please see more extensive comments in response to the River Ranchettes Community letter of comment.

3. No additional recreation and open space opportunities would be created by this proposed project. It does not include creation of new water impoundments or rights-of-way that might be of some recreational value.

4. Comment noted.

STATE OF IDAHO

DEPARTMENT OF FISH AND GAME

REGION 1
2320 GOVERNMENT WAY
COEUR d'ALENE, IDAHO 83814

March 20, 1981

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ENVIRONMENTAL EVALUATION BRANCH

Ms. Norma Young
US Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

Reference: M/S 443
DEIS Wastewater Treatment Facilities
City of Post Falls, Idaho

Dear Ms. Young:

We appreciate the opportunity to comment on the Draft EIS for Post Falls wastewater treament facilities.

1 The reference to personal communications (Goodnight, Page 64) is in error. Those species mentioned refer to the Spokane River above the dam. Most angler days do not occur above the dam, but rather below the dam (Bailey, 1980).

The imapct statement fails to relate the significance of the trout fishery which exists in the Spokane River. A study conducted by Washington State University (Bailey, 1980) indicates anglers harvested 6,508 wild trout between April 20, 1980 and September 30, 1980 within the Idaho reach of the river. This represents only a portion of the harvest since the river is open to fishing year-round and the winter harvest is not included in this total. Both the Idaho and Washington reaches support trophy-sized rainbow up to 10 pounds.

2 It is doubtful that fish will congregate near the outfall as claimed (Page 64) rather, there will likely be significant avoidance.

3 The conclusion that fish production would not be impaired with an 1160% increase in orthophosphorus concentrations during low flow periods is optimistic and the prediction of enhancement is ludicrous (page 67). Biological oxygen demand (BOD) problems are discounted on the premise that major flow reductions below Post Falls are non-existant. Major flow reductions below Post Falls are common! Fish are subjected to minimum flows and discussion of project impacts on fisheries in terms of mean flows simply does not provide a meaningful analysis. Minimizing the importance of impacts as occurring only when flows approach the Q_{7-15} value (Page 60) is misleading since flows below 200 cfs regularly occur.

4 We find Table 1 very intriguing. The impacts of no action reveal only the danger to the aquifer. The action alternatives involve direct surface water impacts

EQUAL OPPORTUNITY EMPLOYER

4 which to some degree influence the aquifer eventually since the river below the proposed discharge point recharges the aquifer.

We oppose summer discharge of wastewater in the Spokane River. Although Phase I calls for eventual implementation of Alternative A, we fear that funding limitations may make (summer discharge) a permanent fixture of the facility.

Sincerely,

David Neider

David S. Neider, Regional Supervisor
Region 1

cc Bureau of Fisheries
Bureau of Program Coordination

Response to Comments From State of Idaho, Department of Fish and Game

1. Statements made about angler use were based on data available at the time of publication. The 1980 fishery data underscore the importance of the Spokane River fishery, especially below the dam.

2. The effluent outfall may attract warmwater species of fish. There will likely be significant avoidance by trout. Ammonia from the outfall may attract some fish species (Hynes 1976).

3. Orthophosphorus is not generally regarded as a significant impairment to fish productivity (U. S. EPA 1976). The projected concentrations should enhance algal production downstream from the outfall. Numerous authors have found high positive correlations between aquatic macrophytes and invertebrate populations (Barber and Kevern 1973; Cudney and Wallace 1980). As benthic invertebrates comprise a large percentage of the diet of resident fish species, increased fish productivity would be a possibility provided other toxic compound concentrations do not reach deleterious levels. Significant BOD problems should not occur due to reduced flows downstream from Post Falls Dam. Table 2-4 in the Draft EIS shows that at Q_{7-15} flows of 1,414 cfs during the winter months and 113 cfs during the summer months the BOD will be 1.14 and 2.12, respectively. Due to the optimal range of recorded dissolved oxygen concentrations and the morphology of the river downstream from the dam, these BOD loads should be effected without reduction of dissolved oxygen to critical levels.

Recently, Washington Water and Power along with the Washington Department of Ecology and the Idaho Department of Fish and Game informally agreed that the minimum flow release at Post Falls Dam would be 300 cfs. Thus, flows below 200 cfs will not occur regularly as claimed. The historic Q_{7-10} summer flow value of 113 cfs was used to provide a very conservative estimate of resultant conditions.

4. Alternatives A, B, and C contain a potential health risk due to groundwater contamination (Tables 3, 4, 5). Since this impact is common to all three action alternatives it should also have been included in Table 2.

STATE OF IDAHO

DEPARTMENT OF HEALTH
AND WELFARE

DIVISION OF ENVIRONMENT
Statehouse
Boise, Idaho 83720

April 20, 1981

Ms. Norma Young
Environmental Evaluation Branch
U. S. EPA
Region X - M/S 443
1200 Sixth Avenue
Seattle, Washington 98101

Dear Ms. Young:

The Division of Environment, Idaho Department of Health and Welfare, has reviewed the draft EIS *Wastewater Treatment Facilities For The City Of Post Falls, Idaho*, and wishes to submit the following comments:

1 1) Page 4 - Please explain how "future growth and development of the area would have to be curtailed" under implementation of the no-action alternative. Is not growth a negative impact, except when mitigated by implementation of city and county land use plans?

2 2) Page 8 - (Phasing) This office requested the City to downsize the plant from 2.4 MGD to 1.5 MGD to correspond with approved population projections. It had nothing to do with staging or limitations on funding.

3 3) Page 9 - The approach approved by the Steering Committee on October 10, 1980 (actually October 8) included the cost for seasonal phosphorus removal.

4 4) Page 10 - We disagree that an interim discharge of secondary effluent above Corbin Park will pose a public health threat to swimmers. Properly treated and disinfected wastewater should present no health threat to swimmers.

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5 5) Page 11 - Recent funding trends indicate that full implementation of the selected alternative will occur after several years. The impacts of the "no-action alternative" are likely to result, although at a lesser degree. Nevertheless, the commencement of design will "begin the process of eliminating septic tank and cesspool use over the Aquifer". As long as the cities continue to proceed with implementation, there will be no restrictions on development within the cities. Therefore, development would not be "halted" as feared by the EPA report.

6 6) Page 24 - It is the EPA that cannot grant a waiver to the seasonal phosphorus limitations.

7 7) Page 77 - The Division is also concerned of the threat due to the "numerous toxic substances that could be found in the City's domestic wastewater". The City of Post Falls encourages industrial development to stimulate the economy and to avoid becoming a bedroom community for Spokane. Therefore, the City must adopt and enforce a strong industrial waste ordinance for the prevention of these toxic wastes in the sewer system. The ordinance should include pretreatment requirements for the different categories of sources. The City must provide enforcement authority to oversee operation and maintenance of industrial pretreatment facilities. Unless the City can provide this assurance, the Division could not approve funding of a land application scheme.

8 8) Page 82 - Most of the farmland is currently under irrigation or fertilization, as water must be pumped from wells. At one time, water was transported to the area via canals originating from Hayden Lake. Reuse would save farmers power costs for pumping. Most farmers, particularly grass growers, fertilize their crops.

9 9) Page 96 - What is the "availability" of each treatment and disposal site? In other words, have the present landowners been contacted and asked whether they would be willing to sell? There are other areas

9 of open lands that could be considered for the land treatment site.

Thank you for the opportunity to comment on this Environmental Impact Statement.

Sincerely,

Lee W. Stokes, Ph.D.
Administrator

LWS/b

Response to Comments From State of Idaho, Department of Health and Welfare

1. If the no-action alternative were implemented, allowable housing densities for new development could be reduced to one dwelling unit per 5 acres or more, pursuant to PHD regulations. Under these regulations, new development could be priced out of the market in Post Falls unless special provisions for on-site or community wastewater systems were implemented. Yes, growth without proper planning may create negative impacts. Refer to pages 112-118 of the Draft EIS for a discussion of growth-induced impacts and implications.

2. Comment noted.

3. The cost for seasonal phosphorus removal equipment was included; however, chemical and equipment maintenance costs were not (Kimball pers. comm.).

4. EPA agrees that an additional public health threat is unlikely. Please see more extensive comments in response to the River Ranchettes Community.

5. The prediction that growth might be halted is in response to implementation of the no-action alternative (see Response Number 1). No action implies that even planning for facilities would not proceed.

6. Seasonal phosphorus limitations should be established cooperatively by the IDHW and EPA.

7. EPA supports a city ordinance which includes pretreatment requirements for the different categories of pollutant sources. EPA agrees that the city should provide enforcement authority to oversee operation and maintenance of industrial pretreatment facilities.

8. The site proposed for irrigation disposal by Post Falls (S-1) is not actively irrigated or fertilized. Use of wastewater would reduce power costs for pumping if the land were put under irrigation. However, the savings would likely be offset by costs incurred for pumping the wastewater to the farm site. These costs have not been described by the facilities planners.

9. It is not known if the facility planners have contacted all landowners about their willingess to sell land. The owners of the three sites described in the Draft EIS were contacted. The city is no longer actively considering land disposal, so additional contacts in the near future are unlikely.

John V. Evans, *Governor*
Daniel T. Emborg, *Administrator*

State Capitol Building
Boise, Idaho 83720

DIVISION OF ECONOMIC AND COMMUNITY AFFAIRS

April 13, 1981

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Donald P. Dubois
Environmental Protection Agency
Region X
Seattle, Washington 98101

Dear Mr. Dubois,

The Idaho State Clearinghouse has completed its review on the DRAFT ENVIRONMENTAL IMPACT STATEMENT WASTEWATER TREATMENT FACILITIES CITY OF POST FALLS - SAI #00215506. The following agencies were contacted for their review and comment:

Panhandle Area Council
Idaho Historical Society
Department of Transportation/Division of Highways
Department of Health and Welfare/Division of Environment
Division of Economic and Community Affairs

At the time of this sign-off, we have received no comments from the above listed reviewing agencies. Any late comments recieved will be forwarded to your agency.

Thank you for letting us be of assistance on this DEIS review. If you have any questions, please do not hesitate to contact myself or Lois Wade at 208-334-4718.

Sincerely,

Gloria Mabbutt

Gloria Mabbutt, Coordinator
Idaho State Clearinghouse

GM/lw

IDAHO
A Land For All Seasons

East Greenacres Irrigation District
P O Box 896
Post Falls, Idaho 83854

March 25, 1981

U.S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, Washington 98101
Attn: Ms. Norma Young (M/S 443)

Dear Ms. Young:

We would like to submit this letter as comment upon the DEIS for the wastewater treatment facilities for the City of Post Falls, Idaho.

1 Basically we would like to clarify two statements made in the DEIS. The first concerns the reference to "prime farm land". We provide irrigation water to most of the land referred to as prime farm land. Our land classification maps show most of the farm land being Class 3 Land, which results from the rocky ground conditions and the short growing season. We feel, as do the farmers in the area, that the farm land in our immediate area is not prime farm land and is in fact marginal land for farm production.

2 The second item concerns the reference to the 100 year flood plane. The old open East Greenacres Irrigation Canals, which originally carried irrigation water through lands within our District, have not been utilized since 1975. All of the canal property has been deeded back to the land owners and has not carried any irrigation water since. Therefore, there should be no reason for classifying any of the land within our District or the immediate area as a "flood plane".

We hope this information will be of some interest to you.

Sincerely,

Robert O. Ashcraft
Manager

ROA:jm

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Response to Comments From East Greenacres Irrigation District

1. The Avonville fine gravelly silt loam and Garrison gravelly silt loam soil types have been determined to have the necessary characteristics to be classified as prime agricultural land by the U. S. Soil Conservation Service office in Boise (Archibald pers. comm.). These two soil types dominate the land surface immediately east and west of Post Falls (refer to Figure 2-3 in the Draft EIS).

Prime farmland is land which can economically produce sustained high yields of crops when treated and managed, including water management, using acceptable farming methods. The factors used to judge whether land is prime farmland are soil quality, growing season, and water supply. The current land use is not considered in classifying prime farmland. Class 3 land may also be classified as prime farmland under the current Soil Conservation Service definition.

Prime farmland is a nonrenewable resource; its conversion to urban uses is essentially an irreversible process. Therefore, EPA is committed to encouraging the retention of prime farmland.

2. An area within the East Greenacres Irrigation District is currently designated as a flood hazard area based on preliminary flood hazard boundary maps issued by the U. S. Housing and Urban Development Federal Insurance Administration. These maps will undergo public and local agency review before Flood Hazard Rate Maps are completed. This review could lead to a determination that the East Greenacres irrigation canals should not constitute a flood hazard area.

To: U. S. Environmental Protection Agency, Region 10

4/15/1981

Subject: The proposed interim discharge point for the Post Falls, Idaho sewage treatment plant. This point is described in the Draft Environmental Impact Statement as being 1.3 miles upriver from Corbin Park.

We are deeply concerned about this proposed location. If situated as described it would be upriver from and very close to over a dozen riverfront homes in the River Ranchettes area, and the McGuire Public Access Recreational area. Most of these homes use water directly from the Spokane river for drinking and/or domestic use,and the wells in the area obtain water by seepage from the river, according to the Geological Survey Team (1978). As there is no alternate source of water available in River Ranchettes, in case of contamination these homes would be left without water.

This stretch of the river is also used extensively for recreation during the summer months by people from nearby areas because it is easy to reach via the McGuire Public Access. It is a popular area on both sides of the river for picnics, fishing, swimming and rafting.

We feel the interim discharge point as proposed would be a health hazard for the River Ranchettes Community and to the many users of the McGuire Recreational Area.

L. D. McChesney

L. D. McChesney
W. 1910 Breezyway
River Ranchettes
Idaho,83854

RECEIVED
APR 20 1981
ENVIRONMENTAL EVALUATION BRANCH

To: U.S. Environmental Protection Agency, Region 10

I have read the attached letter and agree with the views expressed regarding the possible health hazards to the users of the McGuire Public Access recreational area, and River Ranchettes homes.

George Reisnauer N295 McGuire Rd.
Virginia Reisnauer N295 McGuire Rd.
Virginia L Larsen No 150 Elm Rd
Melvin Nesbitson N 75 Elm Rd
Alfred T. Donaker W. 9830 R.R. Ave Post Falls.
Pam Barr W 2850 Railroad Post Falls
Jim Barr W 2850 RAILROAD POST FALLS
Randall Meek W 2875 Railroad Post Falls
Cathy Meek " " " " "
Jerry Hartley P.O. Box 6 CDA Id.
Lamar N. Imler - P.O. Box 490 - Post Falls, Ida
Bertha B. McLean 315 Railroad Post Falls
Theresa Frank N155 Corbin Rd Post Falls Id.
Richard A. Frank N 155 Corbin Rd Post Falls, Id
Terry R Frank N. 155 Corbin Rd. Post Falls Id.
Ben R Babcock N. 71 Corbin Rd. Post Falls, Id.
Gladys Babcock N 71 Corbin Rd Post Falls Idaho
Ken Zimmerman North 15 Corbin Rd. Post Falls Idaho
Roberta Zimmerman N 15 Corbin Rd Post Falls
Rafaela Hastings S. 55 Corbin Rd Post Falls
Lloyd R. Hastings S 55 CORBIN RD POST FALLS
O. J. Holo W 3760 R R Ave Post Falls, Id
Arlene E. Holo W 3760 R.R. Ave. Post Falls Idaho
Margaret Brown W 2755 Cardinal P F Ida

I have read and agree with the views expressed in the attached letter.

Stan Rosenbold	W 3510 K Ave P falls
Ronald R. Lee	W 3338 Railroad P. falls
Eugene R. Lee	3330 Ridgeview Dr. Post Falls
Donna M. Lee	3330 Ridgeview Dr. Post Fal
Sandy Ng	W 15545 K.K. Ave. Post Falls
Betty Little	W 3550 Railroad P.F.
Warren G. Little	W 3550 Railroad P.F.
Alice Blackford	W 3580 Railroad
Lynn Dickey	N 95 Spokane Rd.
Patty Dickey	N. 95 Spokane Rd
Opal Collins	S 70 Spokane Road Post Falls
Harley Collins	So. 70 Spokane Road " "
Mr & Mrs. Ed Merrick	S. 75 Spokane Rd.
Mr & Mrs. Wm Rosenberg	3810 W. Railroad Ave
Frances Thompson	N-60 Pleasant Lane P.F.
James D. Brown	N 50 Pleasant Lane P.F.
Bob Bowling	N 30 Pleasant Lane
Scott Randolph	N 20 Pleasant Lane
[illegible]	N 5 Pleasant Lane
Debbie J. Cable	N 5 Pleasant Lane
[illegible]	N15 Pleasant Lane
Jerry Reames	N. 15 Pleasant Lane P.F.
Hank Wiszkaff	N 25 Pleasant Lane P.F.
Mildred Westlake	N. 25 Pleasant Lane P.F.

I have read and agree with the views expressed in the attached letter.

Thomas B. Ree, N. St Pleasant from Post Falls Id
Karen Reed W3575 Primrose Ln Post Falls Id
Jim Ackles W3780 PRIMROSE
Melanie Ackles W 3570 Primrose Lane Post Falls.
Robert C. Allen W 3895 Primrose Lane Post Falls Idaho
Joan D. Allen W3895 Primrose Ln Post Falls Idaho
Jerry HALLORAN W3930 PRIMROSE LANE POST FALLS, Idaho
LOIS HALLORAN W. 3960 Primrose Lane Post Falls Idaho
Lin Wharf " " " " "
Darlene Wharf " " " " "

These signatures are of concerned residents in the McGUIRE area. If it would be of any help we could obtain many more signers. Please let us know if that would be advisable.

R. W. McChesney
W. 1910 BREEZY WAY
Post Falls, Idaho
83854

To: U. S. Environmental Protection Agency, Region 10

4/15/1981

Subject: The proposed interim discharge point for the Post Falls, Idaho sewage treatment plant. This point is described in the Draft Environmental Impact Statement as being 1.3 miles upriver from Corbin Park.

We are deeply concerned about this proposed location. If situated as described it would be upriver from and very close to over a dozen riverfront homes in the River Ranchettes development, where we reside. Most of these homes use water directly from the Spokane river for drinking and/or domestic use. According to the Geological Survey Team (1978) the homes which do have wells obtain water by seepage from the river. As there is no alternate source of water available in River Ranchettes, in case of contamination these homes would be left without water.

This stretch of the river is also extensively used for recreation during the summer months, because it is easy to reach via the McGuire Public Access. It is a popular area on both sides of the river for picnics, fishing, swimming and rafting.

We feel the interim discharge point as proposed would be a health hazard for the River Ranchettes community and the many users of the McGuire recreational area.

RECEIVED
APR 20 1981
ENVIRONMENTAL PROTECTION AGENCY

L. D. Mc Chesney	L. D. McChesney W. 1910 Breezyway Post Falls, Idaho 83854
K. W. Mc Chesney	W. 1910 BREEZYWAY
Myd B. Ballard	W. 1900 BREEZYWAY
Bernard Ballard	W. 1900 BREEZYWAY
Mae M. DuPerault	W. 1880 BREEZYWAY
Ray E. McGinnis	W. 1920 BREEZYWAY
Evelyn L. McGinnis	W. 1920 BREEZYWAY
Naomi L. Lockman 46	W. 1950 BREEZYWAY
[illegible]	W. 1950 BREEZYWAY

To: U.S. Environmental Protection Agency, Region 10

I have read the attached letter and agree with the views expressed regarding the possible health hazards to the River Ranchettes homes and McGuire Public Access reereational area.

Betty J Shumm	W 2100 Breezy Way
A A Shumm	W 2100 BREEZY WAY
Dorothy Mize	W. 2130 Breezy Way
James L Mize	W. 2130 Breezy Way
Sarah Mize	W. 2130 Breezy Way
Peggy Mize	W. 2130 Breezy Way
John Miranda	W 2140 Breezy Way
Martha Miranda	W 2140 Breezy Way
James R. Stiller	W. 2000 Breezy Way
Edwin E. A. Stiller	W. 2000 Breezy Way
Leo R. Morgan	W 2210 Breezy Way
Vel DeSerault	W 1860 Breezy Way
Erwin DeSerault	W 1860 Breezy Way
Ronald DeSerault	W 1880 Breezy Way
Dorothy L. Booth	W 1980 Breezy Way
Charlie M. Morgan	W 2210 Breezy Way P. Three.

These signatures are of homeowners and/or residents of Breezyway, River Ranchettes, Post Falls, Idaho. It is only a partial listings as some of the residents were on vacation.

Response to Comments From River Ranchettes Community - L. D. McChesney

1. EPA feels that it is unlikely that a significant health hazard will be created by the proposed interim wastewater discharge above Corbin Park. However, we understand the concerns of the River Ranchettes Community and the users of the McGuire Recreational Area regarding possible contamination of drinking water and contact recreational waters.

The Idaho Department of Health and Welfare is considering a fecal coliform effluent standard (NPDES permit) of 23 MPN/100 ml. This is a strict limit which will ensure that no increase in health hazard will occur due to the interim discharge.

A plant malfunction should not result in any increased health hazard. The proposed plant will be built with emergency storage capacity as a necessary precaution. If for any reason the plant's biological treatment process does not function properly, the degree of disinfection can be increased to prevent water contamination by biological agents.

EPA is recommending two further actions to reduce the chances of a public health threat to the people of the River Ranchettes area. The City of Post Falls should investigate the feasibility of supplying water to the Ranchettes area from an alternative source. This could include new wells or water piped from an existing adjacent water supply system. It is also recommended that the outfall be relocated downstream to its originally intended discharge point as soon as the necessary funds are available.

Chapter 2

ORAL TESTIMONY ON THE DRAFT EIS AND EPA RESPONSES

Introduction

A public hearing on the Post Falls Facilities Plan Draft EIS was held in Post Falls, Idaho on April 6, 1981. The following pages contain the transcript of the oral testimony presented at that hearing. Each comment requiring a response has been identified by a line and a number in the left-hand margin of the transcript. Following the transcript, each comment has been responded to in numerical order. If the comment has been responded to in the text of an earlier chapter, the reader is referred to that chapter.

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PUBLIC HEARING ON DRAFT ENVIRONMENTAL

IMPACT STATEMENT

Taken at: Post Falls, Idaho
Date Reported: April 6, 1981

PURSUANT TO NOTICE, a Public Hearing was held before Charlotte R. Crouch, a Notary Public, at the Multipurpose Room of Fredrick Post Elementary School, 201 W. Mullan Avenue, Post Falls, Idaho, at the hour of 7:30 p.m., April 6, 1981.

Speakers present were:

Ms. Debrah Wolin Gates, Hearing Officer.

Ms. Norma Young, Project Manager.

Mr. Jim Kimball, Le Pard & Frame.

Mr. Michael Rushton, Jones & Stokes Associates, Inc.

Mr. Mike Coony, Idaho Department of Health and Welfare.

The Public Hearing was reported in stenograph by the Notary Public, Charlotte R. Crouch, of the firm of Heston & Howell Reporting Service, 816 Sherman Avenue, Coeur d'Alene, Idaho, 83814, and by her later transcribed.

WHEREUPON, the following proceedings were had and testimony given, to-wit:

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Mr. Mike Coony	21
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MS. GATES: Will you please come to order. My name is Debrah Gates, and I am an attorney with the United States Environmental Protection Agency, Region 10 Office in Seattle, Washington. Donald Dubois, our Regional Administrator, has designated me as Hearing Officer for this hearing.

I would like to take this opportunity to welcome you all here this evening. We appreciate your attendance and taking the time to come here and share your views with us. I realize that many of the issues to be discussed are of interest to you.

The purpose of this meeting is to receive citizen comments on the Draft Environmental Impact Statement -- or for short E.I.S. -- concerning the construction of the waste water treatment facilities for Post Falls, Idaho.

For the record, I would like to note that this hearing on the E.P.A.'s Draft E.I.S. concerning the construction of the waste water treatment facilities for Post Falls was convened at 7:43 p.m. at the Fredrick Post Elementary School, 201 West Mullan Avenue, Post Falls, Idaho.

I want to make it clear from the beginning that even though a number of people from different organizations will participate in the discussion of the Draft E.I.S., this hearing is within the jurisdiction of the United States Environmental Protection Agency and is to be conducted by me on behalf of the E.P.A.

As Hearing Officer I would like to tell you the purpose of the hearing, maintain an agenda which will lead to orderly presentations by those participating, and to prescribe a few rules of procedure -- ground rules for the hearing. This public hearing is being held to allow the local citizens the opportunity to comment on E.P.A.'s recently published E.I.S. for Post Falls waste water treatment facilities. The E.I.S. was prepared pursuant to the National Environmental Policy Act or for short, NEPA. Under NEPA any Federal agency contemplating an action significantly affecting the quality of the human environment must prepare a detailed statement addressing the following factors. The factors are:

1. The environmental impact of the purpose action;
2. Any adverse environmental effects which cannot be avoided should the proposal be implemented;
3. Alternatives to the proposed action;
4. The relationship between local short-term uses of man's environment, and the making or enhancements of long-term productivity;
5. Any irreversible and irretrievable commitments of resources which are involved in the proposed action should it be implemented.

The Federal action in this case would be an E.P.A. grant for Post Falls under the Clean Water Act, which covers

75 per cent of the eligible cost of the planning, design, and construction of the project. Thus, before any additional funds for design and construction of the selected projects can be awarded to Post Falls, the NEPA process must be completed. This process involves review by E.P.A. of comments received on the Draft E.I.S., both at this hearing and through written submissions, preparation of a final E.I.S., and a 30-day public review period following publication of the final document. The Draft E.I.S., which is the subject of this hearing, identifies and discusses the environmental impacts of the waste water system alternatives. The no action alternative, which would be the original state, will also be evaluated.

We are going to limit the scope of your inquiries and input to the Draft E.I.S. document under review here tonight. The purpose of this hearing is to evaluate the Draft E.I.S., which examines in detail the potential environmental impact of the various alternatives and efforts to avoid or minimize any adverse impact that may result.

Those wishing to testify at this public hearing have been encouraged to review the Draft E.I.S., which has been on file at the Post Falls Public Library, the Post Falls City Hall, and E.P.A.'s offices since March 6, 1981. Copies were also mailed to State and local officials and citizens of the area.

Note that cards have been passed to you by Ms. Norma Young sitting on my left. If you wish to make a statement, you must have written down your name, address, and the affiliation, and have returned the card to Ms. Young who has collected them. Persons unable to testify at the hearing tonight or wish to furnish comment after the hearing may do so by writing Norma Young, Environmental Evaluation Branch, The Environmental Protection Agency, Mail Stop 443, 1200 6th Avenue, Seattle, Washington 98101. The deadline for comments is April 20, 1981.

I would like to mention at this time that all questions from the floor are to be held until the third stage of this hearing. The discussion and question period will be held after the comment portion of the hearing.

Now, let me give you the agenda for the rest of the hearing program. Following me, we will have on the first portion of the hearing Jim Kimball of Le Pard & Frame who will give a presentation on the facility planning, and second you will have Mike Rushton of Jones & Stokes Associates who will give a presentation on the impact of the various alternatives.

In the second part of the hearing we will have oral presentation. It will occur in the following order: First, other Federal representatives, then State representatives, County, City, and finally individual comments. I will read

off each individual name from the cards that have been submitted. Note that I will limit your presentation to ten minutes at maximum.

The third portion of the hearing will proceed as follows: If time allows, we will have a discussion and question period. Questions may be asked of the panel through me. The panel consists of the following people: Jim Kimball of Le Pard & Frame; Mike Rushton of Jones & Stokes; Norma Young of the E.P.A. Environmental Evaluation Branch who is the E.I.S. Project Monitor; and Mike Coony, Division of Environment, State of Idaho.

As the Hearing Officer, I reserve the right to limit questioning, to call recesses, and adjourn and convene the hearing. As I mentioned before, I ask that individual presentations be limited to less than ten minutes. Written materials should be left with me following your presentation. However, note that you are under no obligation to submit written material.

As a record of this hearing is being made by a court reporter, I ask that you clearly state your name, address, and affiliation, if any, before you speak. I also ask that anyone who wants to make a statement to come forward up here so that your comments will be heard by the reporter.

Copies of this transcript of this hearing will be made available for your inspection and copying at E.P.A.

Seattle offices.

Now, let me introduce Jim Kimball who will give a brief presentation on facility planning, and Mike Rushton who will give a presentation on the impact of the various alternatives.

MR. KIMBALL: The City is in the final phases of the 201 Facilities Plan, and I will briefly start way back. A 201 Facilities Plan is a study to determine the most cost effective method of collecting and treating the waste water from a particular area.

Now, the City of Post Falls is situated over a sole-source aquifer as determined by the Environmental Protection Agency. It is the primary source -- actually, I think it is the sole source of drinking water for the City because they have their wells that penetrate the aquifer. The aquifer has been identified as becoming polluted by septic tanks and drain fields, and when I say polluted it is not to the point that it is exceeding the standard, it is showing degradation, but they are showing that septic tank effluent is leaking down into the aquifer, and eventually you will have problems with your drinking water.

The Department of Health and Welfare in the State just decided that the City should install a sewer system and has allowed the City to proceed with development with interim use of septic tanks and drain fields as long as the City

proceeds with studying and implementation of a waste water and collection and treatment system as long as new development installs dry sewers. So, if a new subdivision goes in, they have to install the sewer lines up and down the streets.

Now, this collection system is one of the major costs of any treatment system. I will give you an example: Over in the Spokane Valley they were in the same place we are quite a few years ago studying the aquifer, and they decided to go ahead and let development proceed without any dry sewers. Now they are looking at sewering the valley, and it is going to cost around $366.00 per year per house just for the collection system. That's about $30.00 a month. If we dry sewer, we take that big portion of the cost of the system out. There, treatment interceptor cost is only around $10.00 a month. So, you can see we have taken a good step here by planning ahead, by installing dry sewers.

One big program we have come up with, and that is if we do collect the waste water we have to treat it and dispose of it. We looked at several alternatives initially and narrowed it down to three different treatment techniques. Number one was a mechanical biological treatment plant with land application in the summer and a discharge into the Spokane River in the wintertime. The Department of Health and Welfare establishes the effluent limit in conjuntion with the E.P.A., and they tell us that if we build a treatment

plant what quality of effluent we have to discharge to the river or what type of criteria we have to pretreat it before we apply it to the land. We've had quite a few delays getting along here, and we still don't know what specific effluent limits we are going to have for the Spokane River. They are completing a study on the Spokane River now called the Waste Water Allocation. I think you've probably read in the paper about the problems Spokane had, and they are looking at phosphorus removal, and so we considered that the City of Post Falls if we build a plant of over one million gallons per day would have to go to phosphorus removal if they go to discharge during the summertime. The advantages of Alternative 1 is that during the low flow in the summertime you would apply the treated effluent to agricultural land, and it would be applied at a rate that was compatible with the land, and it would absorb the nitrogen and bacteria so that by the time it got through the upper soil layer it would be essentially of drinking water quality.

The second alternative we had was to build a chemical biological treatment plant and install phosphorus removal facilities and discharge year round to the Spokane River. This process is similar to what the City of Coeur d'Alene is looking at, and the City of Spokane now is practicing: phosphorus removal.

The third alternative was to construct a lagoon and

apply the waste water to the land in the summer and discharge to the Spokane River again in the wintertime.

I'll go over here and point out the different treatment plant sites that we looked at. Site T-1 initially was situated just west of the Pleasant View Subdivision, just south of the freeway exchange. We moved that to Site T-1A which is further to the west and is just in-between Pleasant View and the Jacklin Seed Complex out in the middle of that grass field. We moved it at the request of the people at the Pleasant View Development.

Another site we looked at, Site T-2 was located just across Seltice, and the land just west of Nelson Road, probably it would be just north of the Slab Inn, that area, and possibly looking at land application north of that in this big section of land.

Site T-3 is located, oh, I think just west of McGuire and south of the railroad.

Site T-4 was a small site down by the Washington Water Power Bridge, and down by the rocks that they have -- I can't think of the name of the archaeological site they have here.

And Site T-5 is located at the property just west of Frontier Leasing.

Site T-6 is located just over the hill from the plant food center, and then to the west down by the Beck property.

Those are the treatment plant sites, land application sites, and we looked at several of those. We looked at the Schneidmiller property here. We looked at the Beck property. We looked at the Jacklin property. We developed cost for the different sites. We eliminated Site T-1, T-3, T-4, and T-2 because of various concerns. So, that narrowed it down to Site T-1A, T-5, and T-6 that we did a thorough analysis on and reviewed those alternatives with the Citizen's Advisory Group which was formed by the City of Post Falls.

The originally proposed Site T-1A, that became unavailable, so we narrowed it down to a selected -- I'll say a recommended site of T-5 by the Citizen's Advisory Group and the City Council. This had the least overall cost and was the easiest to implement.

Now, this picture of what we narrowed it down to -- originally, we would have liked to have funded the entire collection system for the entire city. This would cost approximately $18 million to build a collection system, a complete interceptor system, a line out to a discharge point down by just north of the existing -- east of the Pleasant View project. Due to funding limitations we have cut the scope of Phase 1 back to a collection system which we could fund by a $1.6 million grant from the State, and approximately $4 million from the Department of Health and Welfare and E.P.A. Grant Program and that's the hearing that we are having

now which covers the availability of these funds for which alternative you have.

Now, the State and E.P.A. may select a different alternative than we have. They may disagree with our analysis. The final selected alternative will come out of the E.I.S. hearing and negotiations with the State and other considerations before we actually implement anything, and that will come up in a Step 2 phase, which is design. We have not designed anything, we're still in the preliminary planning, and we have this hearing to take public input to determine if there are other concerns and maybe other alternatives we should look at.

MR. RUSHTON: Hello, I'm Mike Rushton with Jones & Stokes Associates. We are an environmental consulting firm under contract to E.P.A. in Seattle to prepare an environmental impact statement such as this in the Northwest.

We actually started on this project and began working on this E.I.S. back in June of 1979 when the City of Coeur d'Alene started up with a facility planning process, and E.P.A. decided that at that time because Post Falls and Coeur d'Alene were both in the facilities planning process we would prepare an environmental impact statement simultaneously on both projects. The first year of our endeavor was actually following the two facility plans

simultaneously, getting familiar with the area, collecting background information, going to Advisory Committee meetings, and this sort of thing. After about a year of following the project, E.P.A. decided that the issues were sufficiently different in Post Falls and Coeur d'Alene that they would split the two E.I.S.'s and have two separate documents. Over the last six months or so we have completed a work on the Draft E.I.S. for Post Falls, published it, and got it out to the public.

I would like now briefly to go over what I think are the most significant findings that are environmental impact findings that are included in that document. Each of the three alternatives that Jim Kimball mentioned would accomplish the primary objectives of the City of Post Falls in the environmental concerns. It would start the process of getting rid of some of the septic tanks and cesspools that are identified by the Panhandle Health District as slowly contaminating the sole source aquifer here in Idaho and on into Washington.

Any of the three alternatives would also allow the City of Post Falls to continue with development plans without relying on interim or dual waste water systems, and this is an obvious economic benefit in building new construction in the area. If any of those three alternatives were constructed at the size originally planned for in the Facilities Plan,

which was originally I think going to be a 2.4 million gallon per day plant with the capacity to eventually accommodate about 26,800 people, that type of development, regardless of which alternative, would result in approximately 4,700 acres of newly developed urban acres in the Post Falls area by the year 2000. Much of that development would take place on what the Soil Conservation Service in this area identified as primary agriculture land both west and east of the City. In addition, the City's own water system, public schools, fire and police protection, and other such services, would have to be expanded by at least twice their present level to supply that level of development.

Just prior to us publishing the Draft E.I.S., the Idaho Department of Health and Welfare indicated that Post Falls' Facilities Plan should not be planned for a 2.4 million gallon size. It was in fact identified that a smaller size of approximately 1.5 million gallon per day capacity would be acceptable to the State, and that would service approximately 16,000 people rather than 26,800.

The growth impact of that type of development would obviously be much smaller than most of the impacts that are reported in the E.I.S. that you've reviewed. There are serious other impacts that are common to all three alternatives that have been described. For example, the collection system, I believe, this was the first phase collection system

cost at about $6.1 million. That would be common to all three of the alternatives that we discussed. Also, all three alternatives included a wintertime discharge to the Spokane River which would add some nutrients, heavy metals, and so forth, to the Spokane River during that period. And it's also likely that that discharge, regardless of the alternative, would be considered undesirable by water contact users downstream from the outfall. Each of those alternatives also have a few impacts that are peculiar to themselves. Alternative A, which we mentioned was a mechanical secondary treatment plant with a seasonal land application and seasonal river discharge, the treatment plant size that we selected for that site was Site T-5, which he mentioned was out here just a little bit west of town. That site would require removal of about 15 acres of prime agricultural land if it were used. The irrigation of the effluent during summer months would pose a potential health threat to persons distracting domestic water from the aquifer down grade from that disposal site. The site that he was identifying as the first site is Site S-1, the furthest to the west on this map. I'll point that out, (speaker indicating on map) it's fairly important. This is the disposal site that he was recommending for Alternative A, so basically waters washed downriver from this site would have a potential for long-term degradation from the irrigation effluent on that site. And

that potential would become much more serious in the eyes of the E.P.A. if industrial type development were eventually hooked into the City system because quite often the waste water of industrial sources have much more potentially adverse contaminants in them.

Another impact from that particular land disposal operation would be the threat of aerosol drift from the spray irrigation area. The design of that system would be such that it would minimize any blowing mist and aerosol from the area because of bacterial and viral contamination that can occur in those sorts of operations. The treatment plant site at T-5 would also have some minor odor and visual impact associated with it because it is so close into town. And in a facilities plan -- the unstaged present worth cost of this alternative was listed at $10.6 million with a user fee of about $7.90 per month. Those costs did not include any of the collection system costs. That's just simply for treatment and disposal costs.

Alternative B, which was year-round discharge of waste water discharge to the Spokane River with season phosphorus removal also using Site 5 -- Site T-5 as the treatment plant location, would have basically the same agricultural land loss, odor, and visual impacts that I described for A. With the discharge to the river in the summer months when the river is in a low state and the

river is warmer, you have a much greater chance of inducing bacterial growth below the discharge point of the river -- and that's discussed in further detail in the Draft E.I.S. -- again, a potential health risk to persons drawing domestic water out of the river in the summer months. There are just a limited number of people downstream from Post Falls that draw that domestic water supply from the river, but those would be endangered in the summer months when the flow is low.

And finally, Alternative B had an estimated cost of 8.7 million, and a monthly user fee of about $8.65 excluding collection system costs, again.

Finally, Alternative C, which was a lagoon treatment system -- lagoon secondary treatment system with seasonal land application and seasonal river discharge, the largest potential impact from that, again, would be the threat to the ground water posed by the irrigation operation itself. And again, the same location, Site S-1, would be involved in that irrigation scheme. That irrigation operation would have also the aerosol drift problem, but there would be no major land use conflicts using the site preferred for Alternative C. The treatment plant itself would be located out near S-1, quite a ways outside the City, out in the agricultural land. And the cost of Alternative C identified in the Facilities Plan were $9.8 million, and a user cost of about $7.10 per

month.

The last alternative that we discussed in detail in the Draft E.I.S. was the No Action Alternative, and that would mean basically doing nothing about the waste water treatment problem in Post Falls. The most obvious impact of that -- proceeding on that alternative would be a continued threat to the ground water in this area from the many septic tanks and cesspools that are now in use over your water supply. The cost impact of no action would be at the outset relatively minor. People would continue to pay for their own installation, maintenance, and so forth, but it's also possible under a No Action Alternative that the aquifer protection policy of the Panhandle Health District would eventually severely restrict further development planning in the Post Falls area due to the lack of what they say is adequate waste water facilities.

Those are the major environmental impacts that are discussed in the Draft E.I.S. I'd like to just mention briefly what our process is in the E.I.S. from this point on. We will take the public testimony given at this hearing and anything that is received in writing, and respond to that in writing for a final environmental impact statement. The close of public comment on the Draft E.I.S. is April 20, anything received in writing or verbal before that time will be responded to in the final E.I.S. After that, if there are

no major adjustments made in the facilities planning itself, we will prepare the final E.I.S. and publish it in the Federal register and distribute it for public review. Thirty days after that document appears in the Federal register, E.P.A. can make a decision on its funding of further construction or design grants for the City of Post Falls.

MS. GATES: This concludes the first portion of the hearing. We will now have the second portion which consists of oral presentations. Are there any other Federal representatives here who would like to make a statement at this time?

(NO RESPONSE.)

Any State representatives?

MR. COONY: I'd like to make a brief statement.

MS. GATES: All right. Please come forward.

MR. COONY: Hi, my name is Mike Coony and I'm with the Division of Environment right here in Coeur d'Alene, and I've been on this project for about a year and a half, pretty much reviewing the work that Jim Kimball and Mike Rushton both have done, and I've just got a couple brief comments.

Number one: The effluent limitations for discharge to the Spokane River, the requirements for phosphorus removal have always been as given in the facilities planning process. In other words, during facilities planning it is always been

assumed that phosphorus will be required. And any alternatives that are considered must include phosphorus, and any of the projects that have been considered do include the phosphorus removal.

The second point I'd like to make is that any discharge to the river will be disinfected. It is just part of the requirements of providing a good effluent. This is secondary treated quality, but in this case phosphorus removal is being considered.

Third is the funding, and probably a lot of you are probably wondering what the funding -- the future of funding is for this project. Now, I know this is really not a consideration in the environmental impact here but I think I ought to kind of mention to you that funding, at least from the E.P.A. and the State, is somewhat questionable at this time due to the recent -- or new administration; that is, President Reagan and the budget cut he has presented to Congress.

On the wall over there you see how much money will be required of the City for certain portions of the project, and they are outlined up there. That is concerning the first phase, and that's considered a start considering the funding constraints that are proposed. This is what we think that we will be able to provide to get you going. The 1981 cost you see up there is for design of that system, and the 1982 cost

is for the construction. The funding for 1982 probably will not come until late '82 -- this is the earliest -- I would guess October or November of 1982 considering what Congress will be doing.

That's all I have.

MS. GATES: Are there any City representatives here who would like to make a statement?

(NO RESPONSE.)

Any County representatives?

(NO RESPONSE.)

All right. Now we will now proceed to individual comments. I'll read off each individual name, each individual name from the cards submitted. Again, I'm going to limit your presentation to ten minutes at maximum.

Will Bruce Shadduck please come forward?

MR. SHADDUCK: Well, what I was wondering is on -- all this on the environmental impact, and have we got it okayed to go ahead or are we just still waiting? Does anybody know?

MS. GATES: We will have a question and discussion period later on.

MR. SHADDUCK: Well, I mean, this is what I'm interested in is we are sitting here spinning our wheels and we are still not getting anywhere, and why, what are we doing? Now, that's a good question.

MS. GATES: Would Paul Hoskins please come forward?

MR. HOSKINS: Paul Hoskins, homeowner.

There are a couple of comments I wanted to make in reviewing this statement. It does not apply to the present planned facility. In other words, it was designed -- the State was considering a 26,000 population, as I understood it, and now they are considering a 16,000 population as I understand it. I'm curious as to why we can't consider a 10,000? I understand our present population is slightly over 5,000, and if we plan for doubling that population and we pay in advance for doubling that population, it seems like it is quite a penalty to put on the present people to pay for the other half that may come along.

Now, this isn't the total cost because our cost also will include additional schooling and all this sort of thing when we talk about doubling the population. If we talk about tripling the population -- the 16,000 figure -- that means we are going to pay in advance three times our actual cost per individual. Right now it seems like the cost, if it did turn out to be approximately $12.00 per month -- that would be $150.00 a year for each homeowner. And that is in advance, we voted for it. I sincerely hope that we don't get this cart running for too many years before we get the sewer running.

MS. GATES: All right. Thank you.

Gary Schneidmiller?

MR. SCHNEIDMILLER: My name is Gary Schneidmiller, my address is North 5521 Chase Road, Post Falls, Idaho.

There are two issues that I'd like to point out. Both issues are discussed in the Draft Environmental Impact Statement on Page 118. The first one is specific to agricultural land. Again, Page 118, Paragraph 1, and I would like to read from the study: "Prime agricultural land predominates in both an easterly and westerly direction from the City limits." And then, prior to that and following that subsequently there are also other comments. I would like to, I guess, take issue with the subject of prime agricultural land in terms of future development of that property and how that sort of reference may or may not be appropriate. My question first of all would be the -- well, it certainly clearly indicates that the source is from personal communication from a representative of the U.S. Soil Conservation Service. I would like, I guess, to suggest and ask reconsideration as to number one: The source and what standard is used in making that determination. I would like to point out that primarily in Kootenai County I'm wondering if we have any prime agricultural lands. Number one, we have primarily a one-crop agricultural system that's been applied to prairie land. I'd point out that there's considerable rock, and I would point out also that the water source that's been supplied to these lands as well as other lands in the

county are of an artificial nature, and so again, I'm not sure what standard is used. I don't think that a normal standard that is considered identifying property as prime agricultural land is appropriate, and I would request and recommend a review of this particular issue that is brought forth, and request deletion of any reference to prime agricultural land in terms of the facilities planning area that's identified.

Secondary, I'd also like to point out with regard to flood plains. Once again, on Page 118, Paragraph 3 -- and I would once again read from the Draft: "Within the facilities planning area, the Spokane River, which bisects the southern portion of the planning area, and the East Greenacres east ditch, which traverses western border of the City of Post Falls, are potential flood hazard areas." I think specific to the East Greenacres District and the East Greenacres east ditch, that's probably an inaccurate statement in terms of its potential flood damage possibility. Number one, that ditch was abandoned probably five years ago and it essentially no longer exists. For that reason, I don't think that probably that reference is any longer appropriate. I would further point out that I believe that there should be forthcoming, if not already received, a letter from East Greenacres Water District specifically with regard to flood plain and/or specifically that ditch.

In that regard, I would again request and recommend reconsideration and reclassification speaking to flood plains within the facilities planning area.

MS. GATES: Okay, we will now have a discussion and question period. Questions may be asked of the panel through me. As I mentioned before, the panel consists of Jim Kimball, Mike Rushton, Norma Young, and Mike Coony. Are there any questions at this time?

MS. YOUNG: How about the gentleman over there? I forget your name.

MR. SHADDUCK: I had a question as to whether the Environmental Protection Agency had okayed these places out here for us or are we still pending?

MS. YOUNG: The reason that we have the Environmental Impact Statement is to discuss all the alternatives. Now, your Advisory Committee has recommended and has discussed with Mr. Kimball a certain alternative, which I understand is mechanical treatment, and I believe we described it as Alternative B. Is that not right, Jim?

Now, the reason we put out this Environmental Impact Statement is to bring out all the facts on all the alternatives. After we have completed this comment period that we have here and responded to all the comments of people that are here, we will put out a final E.I.S. At this time E.P.A. will indicate whether they want to fund or want to go along

with the recommendations of the City.

MR. SHADDUCK: Well, that is what I was trying to point out is if and when we do get our sewer system started. We voted for it in 1979, and now it's 1981. And so, now here we sit now. We don't know what the cost is, if it is this much higher or that much higher or any higher. And the people that live in Post Falls I don't think are going to go for it. You know, I mean it's going to have to come back for another bond election or whatever to go through because the old bond election as far as I am concerned now is -- we are spinning our wheels on it because our cost escalation has gone clear out.

MS. YOUNG: We would hope to complete this E.I.S. process by probably late summer and get it into the Federal register, and then you have a thirty day period then, you see, for more comments, which you should direct to me if you want to write them before we make a final decision, and the Regional Administrator of E.P.A. decides on a final action. So, that would mean that you probably would not be able to go on to design until -- I don't know how long it takes to get those things going after you have finally completed that process. Couple of months or so?

MR. KIMBALL: We planned on initiating the process to allow us to proceed with design as soon as the E.I.S. process is done. So, we can start the paperwork now so that the

minute that E.P.A. says everything is fine, we can start with design.

MR. SHADDUCK: But what are you going to do about it, are we going to have to have another bond election or --

MR. KIMBALL: Well, we are going to look at the different financing, but when we determine the source of funds -- and we're looking at probably another year before we have everything wrapped up -- the State -- we had to cut out some funds from the State Department of Health and Welfare, we're looking at Farm Home. We will stick with the proposed $12.00 per month fee as long as we can, but if we find that it's jeopardizing the project if those funds -- grant funds we anticipated getting are not available, we will go back to the people for another bond election when we determine the final cost. You know, when we find out who is going to give us what, if it's 12, 15 or 20. We go back to the people and have another bond election before we proceed beyond any design or -- you can't go to construction unless you have a bond election, so -- but we don't want to stop everything and wait until everything is lined up because it is a problem getting E.P.A. and Farm Home and the State and everybody at one time. We've got to proceed ahead.

MR. SHADDUCK: That's all I have.

MS. GATES: Yes, please come forward and state your name.

MR. SMITH: My name is Jack Smith, P.O. Box 905, Post Falls.

To Jim Kimball, if I may. On the selected site -- was it T-2, to the west of --

MR. KIMBALL: T-5 is what we selected.

MR. SMITH: Oh, T-5. Is that the one west of the Leasing?

MR. KIMBALL: Yes.

MR. SMITH: Oh, is there any beautification involved in that or is it just going to sit next to the freeway with just bare -- open or how does that work?

MR. KIMBALL: Part of the program does include landscaping so that when the plant is constructed -- actually, it will have modern architecture and look like some of the structures we have around now, some of the newer treatment system plants. I think you'll see Liberty Lake in now, and it will be similar to it, and it will be done in probably another six months. You'll have a good picture of what we'll look like beside the freeway, too. And we have landscaping plans, we'll have a buffer strip around it so that -- the newer treatment plants, you know, we can design them to be odor free, but we still can't stop operator errors. So, you might have a problem, but we anticipate we will try to cover everything we can, and we will not be building a lagoon there. It will be a mechanical treatment plant, and they have much

less susceptibility for odors than a lagoon system.

Now, I would like to take a minute to respond to the gentleman's comment about the phasing. When we started out with the facilities plans, the City was growing at approximately 11 per cent per year. So, we looked at a continuation of that growth if it did occur just to cover -- or should growth continue at that rate, say if we had a doubling every ten years or even more than that, we could end up with 26,000 people. However, we wouldn't want to build a facility for 26,000 if we only have 5,000 people. So, what we planned on doing was planning for that amount of people doing an environmental impact now of that large population but cutting back to a realistic number, and we're looking at around 10,000 or 12,000 initially that we are going to build a treatment plant for. But it will be sized, it will be designed such that we can build on up so that, say, if we have a high growth rate and we hit 10,000 people in ten years, we don't have to go through this whole process again of three to five years with environmental impact statement and everything else. So, we wanted to cover enough future population so that we don't have to go through a facilities planning process every five or ten years. So, we cut it back to something that's economically realistic and provides enough reserve capacity of about 30 to 40 per cent at the most for future growth so that the people in town

don't have to pay for future growth.

Thank you.

MS. GATES: Are there any other questions?

MR. HOSKINS: It would appear, then, if I understand the panel correctly, that with the E.P.A. process completed and your planning and going on through, if the cost substantially increased beyond the $12.00 bond that's been passed at the present time, we will still come up to a go or no go situation. We will be back to the one alternative of nothing and no growth or we will be back to a new bond issue; is that correct?

MR. KIMBALL: Yes. At that point that we find that we cannot stay within the original budget, and that point hinders, you know, we will try to get the grant money to keep it down to $12.00 per month. If all those funds die out and it looks like it's going to delay the project and we come up with something that's realistic, we will go back to the people for another bond election.

Frank, do you have any comment on that? Is that basically what --

MR. HENDERSON: Frank Henderson, Mayor of the City of Post Falls.

Yes. That's been a major concern to the City Council is what the lapse of time has done to our estimated cost. And it's unanimous in the City Council at this time

that if those costs get above the $12.00 per month service fee, which was promoted in the bond election, then we would go back to the people.

Now, I would add one thing to what Jim said about phasing is that the City Council now is considering a time at which this will go into effect is if growth happens in this city there will be a point in which we will assess a $1,000 per home hook-up charge, and we will accumulate those $1,000 in a fund for capital expansion and improvement of this system so that the folks here in fact do not pay for the growth that comes in.

MS. GATES: Are there any other questions?

Yes, please come forward.

MS. HEDRICK: Did I understand you to say that the future people will pay a thousand dollar hook-up or we will pay it now within the area?

MS. GATES: Could you state your name, please?

MS. HEDRICK: I'm sorry. Caroline Hedrick, resident.

Because the bond was promoted with free hook-up and a $12.00 a month fee.

MR. HENDERSON: That's correct, yes. The existing residences, according to the terms of the bond election, would be hooked up at no charge. That's correct to your memory? That's the way it was presented?

MS. HEDRICK: Yes.

MR. HENDERSON: Okay, at the time that the sewer service becomes available, at that time then any new residences will have to pay the new hook-up charge. Those were the terms of the bond election.

MS. GATES: Yes, please come forward and state your name.

MS. KELLOGG: Hilda Kellogg, Post Falls.

I'd like to address a question to the Mayor, if I may.

We talked about the bond election and the service fee to the existing residences. Is this also the original boundaries or is this the new boundary that you have up on the map here for Phase 1?

MR. RUSHTON: I'll have to ask Jim Kimball if that boundary is changed. I don't think so. I think the boundary is the City limits; isn't that correct? Even though we will phase the construction within the City, Phase 1 is the City limits; is that correct?

MR. KIMBALL: Yes. We've got different phases, we looked at Phase 1 for a treatment plant site which would include the existing City limits. As far as the Stage 1 of our collection system, though, we based that on the amount of grant money that we could get. The State said, well, they'd sponsor up to about 1.6 million. So, we had to cut back what we could build initially within that 1.6 million State money, and then we added the interceptor systems to go along with

that.

Now, from here on down (indicating on map) this interceptor system will primarily serve new developments with dry sewers. This development in here, this development, this development in here, some of this up in here is all dry sewers. So, once we get this basic system in, extension may not be too bad of a problem because we have -- as these areas develop, we will have a lot of people paying that we don't have to have a high cost.

The north part, the rest of this up here -- okay, now what we have to do is we have to continue to go back for additional grant money either through HUD, E.P.A. or whatever to complete this area, and some of the older portions in here.

MS. KELLOGG: The plan would still be, then, to hook up without charge?

MR. KIMBALL: That's what the City will have to go by here.

I think what they're trying to change in the grant programs, instead of having a hundred different granting agencies they may consolidate and give the City a block grant for 10 million or 5 million, and they'd decide their priorities. The City will have to decide streets, water, sewer, or whatever priority they want.

MS. GATES: Are there any other questions?

(NO RESPONSE.)

This will conclude the third portion of the hearing. As I mentioned before, if you wish to submit written comments they must be in to Ms. Norma Young by April 20, 1981.

Thank you all for attending and participating in this hearing.

For the record, this meeting stands adjourned at 8:37.

CERTIFICATE

STATE OF IDAHO)
) ss
COUNTY OF KOOTENAI)

I, CHARLOTTE R. CROUCH, the undersigned Certified Shorthand Reporter, hereby certify that I took in stenograph and thereafter transcribed into the foregoing record the proceedings in the within entitled cause, and that the said transcript is a full, true and correct copy of the proceedings had in the above-entitled cause held at Post Falls, Idaho, on April 6, 1981.

DATED This 17th day of April, 1981.

Charlotte R. Crouch

CHARLOTTE R. CROUCH, C.S.R.
Notary Public in and for the
State of Idaho, residing at
Spirit Lake therein.

Response to Comments Received at the Public Hearing on Post Falls Draft EIS, April 6, 1981

1. Mr. Hoskins' question is answered by Mr. Kimball on page 31 of the Post Falls public hearing transcript (April 6, 1981).

2. Please see the response to East Greenacres Irrigation District letter of comment in Chapter 1.

3. Mr. Shadduck's questions are answered by Ms. Young and Mr. Kimball on pages 28-29 of the Post Falls public hearing transcript (April 6, 1981).

4. Mr. Smith's question is answered by Mr. Kimball on page 30 of the Post Falls public hearing transcript (April 6, 1981).

5. Mr. Hoskins' question is answered by Mr. Kimball and Mayor Henderson on pages 32-33 of the Post Falls public hearing transcript (April 6, 1981).

6. Ms. Hedrick's question is answered by Mayor Henderson on pages 33-34 of the Post Falls public hearing transcript (April 6, 1981).

7. Ms. Kellogg's question is answered by Mr. Rushton and Mr. Kimball on pages 34-35 of the Post Falls public hearing transcript (April 6, 1981).

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ACRONYMS AND ABBREVIATIONS

BOD	-	Biochemical oxygen demand
CWA	-	Clean Water Act
EIS	-	Environmental Impact Statement
EPA	-	U. S. Environmental Protection Agency
FIA	-	U. S. Federal Insurance Administration
FmHA	-	Farmers Home Administration
IDHW	-	Idaho Department of Health and Welfare
mg/l	-	milligrams per liter
MPN	-	most probable number
NAAQS	-	National Ambient Air Quality Standards
NEPA	-	National Environmental Policy Act
NPDES	-	National Pollutant Discharge Elimination System
NIPDWR	-	National Interim Primary Drinking Water Regulations
P	-	phosphorus
PHD	-	Panhandle Health District I
Q_{7-15}	-	lowest 7-day average flow condition reported over 15 years of record
RCRA	-	Resource Conservation and Recovery Act
SDWA	-	Safe Drinking Water Act
USGS	-	U. S. Geological Survey
USSCS	-	U. S. Soil Conservation Service
WWP	-	Washington Water Power Company
201	-	Section 201 of the Clean Water Act (wastewater facilities planning)